EXHIBIT "B" (2 of 2)

	Case 7:07-cv-02866-CS-GAY Docume	nt ₁ 23-22	Filed 05/07/2008 Page 2 of 35
	1 Kevin Dub.	ļ	111
			Kevin Duffy
02.20:00	the state of the s		2 do you know if anybody here ever checked Spencer
0220.04	- cape: 13c democraty wild a at risk for progression	02:22:36	3 Slnkov's vital signs?
j 107	4 to a more serious level of withdrawal?	02.2235 4	A. I don't know that they did.
	5 A. You'd have to look in the	02:22:40	 Q. Do you know if anybody, subsequent
}	6 correctional officers' manual or handbook for	02:22:43 B	to intake, ever checked his vital signs?
62:20:17	7 that.	02:22:47 · 7	A. No.
	8 Q. You don't kπow?	\$2:Z2:43 8	. 4. When pasan Models thad the retestal
	9 A. No.	022230 9	to mental health for a history of substance
02:20::0 11	1110 810	022253 10	abuse, do you know if she ever checked Spencer's
1022020 11	to the program to a finde serious level	or:zz:56 1 1	vital signs?
02:20:23 12	The state of determination of the state of the	022257 12	A. No.
022025 13	· ····································	g₂2≥57 13	Q. And in terms of inmates who have
1022028 14		oż;zose 14	normal vital signs and who are stable and
62:20:29 1 5	at the eley media then notify	022305 15	otherwise healthy, there are five paragraphs in
022032 16	and person floods to be	0223.00 16	terms of the procedures that are supposed to be
02:20;36 17		62:22:11 17	implemented,
c2:20:37 18	A. Yes.	6223:1 18	Did you see that?
082037 19	The Hoxe page, 302, 1115t 165	0223:12 19	A. Yes.
m-20.54 2 0	paragraph, "The following procedures will be	02:23:13 20	Q. Were those actually ever implemented
02:20:55 21	military and addition initiates, who have normal	e222#6 21	by AmeriCor?
0221.00 22	vital signs and who are stable and otherwise	023X17 22	A. I'll have to read them.
0221:03 23	healthy."	æ2121 23	(Pause in the record)
02:21:04 24	Do you see that?	GZ253B 24	Yes.
0221:05 25	A. Yes.	03:23:70 25	Q. And in terms of Number 2, does that
ļ	COMPU-TRAN SHORTHAND REPORTING	1	
·	OUNICOSTRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
; 	110	<u> </u>	COMPU-TRAN SHORTHAND REPORTING 112
,		1	COMPU-TRAN SHORTHAND REPORTING 112 Kevin Duffy
1 0222::55 2	110	1 02:27:41 2	
.	110 Kevin Duffy		112 Kevin Duffy refresh your recoßection that Methadone is not
02:2:::5 2	### ##################################	02:23:41 2	
02:21:09 3	710 Kevin Buffy Q. Prior to November 27th, 2006, how would a nursing staff know if an Inmate had	12:21:41 2 92:20:44 3	Kevin Duffy refresh your recoßection that Methadone is not used as a matter of policy at the Putnam County Correctional Facility?
02221:05 2 0221:09 3 0221:13 4	### ##################################	02:Z1:41 2 92:Z3:41 3 02:Z3:41 4	Kevin Duffy Kevin Duffy refresh your recollection that Methadone is not used as a matter of policy at the Putnam County Correctional Facility?
022103 3 022103 4 022103 5	### Kevin Buffy Q. Prior to November 27th, 2006, how would a nursing staff know if an Inmate had normal vital signs, if that wasn't required? A. The fact that vital signs are not	10:20:41 2 02:20:44 3 02:20:41 4 02:20:41 5	Kevin Duffy refresh your recollection that Methadone is not used as a matter of policy at the Putnam County Correctional Facility? A. As a matter of policy, Methadone is not used.
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0222:25 2 6221:29 3 0221:13 4 0222:21 5 0221:23 6 0221:23 7 6221:25 8 0221:25 8 0221:25 10 0221:25 11 0221:25 12 0221:27 14 0222:21 15 0222:21 15 0222:21 15 0222:21 18 02:22:21 18 02:22:21 21	Kevin Buffy Q. Prior to November 27th, 2006, how would a nursing staff know if an Inmate had normal vital signs, if that wasn't required? A. The fact that vital signs are not required, does not mean that they are not done. Q. Well, do you know, as a matter of routine practice, if nursing staff did check inmate vital signs at any period of time after they arrived into the facility? A. Well, they would take vital signs if they saw an inmate, for instance, in sick call. If an inmate came in and looked healthy and was not exhibiting any signs and symptoms — in this case of drug withdrawal — but they complained later through the sick-call process, or they utilized the 24-hour access to medical that they have, then at the time the nurse saw them, they would be evaluated; vital signs would be taken. Q. In terms of the following procedures being implemented for addicted inmates, when do those procedures come into play? Is it at intake	02:21:41 2 02:20:41 3 02:20:41 4 02:20:41 5 02:20:41 6 02:20:55 7 02:20:57 8 02:20:57 8 02:20:57 10 02:20:01 10 02:20:01 10 02:20:01 11 02:20:01 13 02:20:01 14 02:20:01 15 02:20:01 16 02:20:01 17 02:20:01 17 02:20:01 18 02:20:11 19 02:20:11 19	Kevin Duffy refresh your recollection that Methadone is not used as a matter of policy at the Putnam County Correctional Pacility? A. As a matter of policy, Methadone is not used. Q. And in terms of Number 4, "Nurses will monitor inmates on a regular basis during detoxification." Do you see that? A. Yes. Q. What does that require? A. That goes back to the Drug and Alcohoi Flow Sheet that we were talking about. Q. So, this would be only after somebody exhibits a sign or a symptom that a nurse is aware of pertaining to withdrawal? A. Yes. Q. Not before? A. Well, they'd have to be exhibiting some signs or symptoms in order to initiate the process.
0222:25 2 6221:29 3 0221:21 4 02:21:21 5 02:21:21 6 02:21:22 7 62:21:25 8 02:21:22 9 02:21:25 11 02:21:25 12 02:21:25 15 02:22:01 15 02:22:01 15 02:22:01 15 02:22:01 17 02:22:02 18 02:22:01 19 02:22:02 18 02:22:01 21 02:22:01 21	Kevin Buffy Q. Prior to November 27th, 2006, how would a nursing staff know if an Inmate had normal vital signs, if that wasn't required? A. The fact that vital signs are not required, does not mean that they are not done. Q. Well, do you know, as a matter of routine practice, if nursing staff did check inmate vital signs at any period of time after they arrived into the facility? A. Well, they would take vital signs if they saw an inmate, for instance, in sick call. If an inmate came in and tooked healthy and was not exhibiting any signs and symptoms — in this case of drug withdrawal — but they complained later through the sick-call process, or they utilized the 24-hour access to medical that they have, then at the time the nurse saw them, they would be evaluated; vital signs would be taken. Q. In terms of the following procedures being implemented for addicted inmates, when do those procedures come into play? Is it at intake	02:21:41 2 02:20:41 3 02:21:51 4 02:21:51 5 02:23:51 6 02:23:57 8 02:23:57 8 02:23:57 8 02:24:00 9 02:24:01 10 02:24:02 11 02:24:02 12 02:24:03 13 02:24:03 13 02:24:03 15 02:24:03 16 02:24:03 16 02:24:12 17 02:24:13 19 02:24:15 19 02:24:15 19 02:24:15 20 02:24:25 22 02:24:25 22	Kevin Duffy refresh your recollection that Methadone is not used as a matter of policy at the Putnam County Correctional Facility? A. As a matter of policy, Methadone is not used. Q. And in terms of Number 4, "Nurses will monitor inmates on a regular basis during detoxification." Do you see that? A. Yes. Q. What does that require? A. That goes back to the Drug and Alcohoi Flow Sheet that we were talking about. Q. So, this would be only after somebody exhibits a sign or a symptom that a nurse is aware of pertaining to withdrawal? A. Yes. Q. Not before? A. Well, they'd have to be exhibiting some signs or symptoms in order to initiate the process. Q. The nurse would have to be aware,
0222:25 2 6221:29 3 0221:21 5 0221:21 6 0221:22 6 0221:23 7 6221:25 8 0221:25 10 0221:25 11 0221:25 12 0221:27 14 0222:15 15 02:22:05 16 02:22:05 17 02:22:05 16 02:22:05 17 02:22:05 17 02:22:05 19 02:22:05 19 02:22:05 20 02:22:05 20	Kevin Buffy Q. Prior to November 27th, 2006, how would a nursing staff know if an Inmate had normal vital signs, if that wasn't required? A. The fact that vital signs are not required, does not mean that they are not done. Q. Well, do you know, as a matter of routine practice, if nursing staff did check inmate vital signs at any period of time after they arrived into the facility? A. Well, they would take vital signs if they saw an inmate, for instance, in sick call. If an inmate came in and looked healthy and was not exhibiting any signs and symptoms — in this case of drug withdrawal — but they complained later through the sick-call process, or they utilized the 24-hour access to medical that they have, then at the time the nurse saw them, they would be evaluated; vital signs would be taken. Q. In terms of the following procedures being implemented for addicted inmates, when do those procedures come into play? Is it at intake or something else?	02:21:41 2 02:20:41 3 02:20:41 4 02:20:41 5 02:20:41 6 02:20:51 7 02:20:57 8 02:20:57 8 02:20:57 10 02:20:01 10 02:20:01 10 02:20:01 11 02:20:01 11 02:20:01 12 02:20:01 13 02:20:01 14 02:20:01 15 02:20:01 16 02:20:01 17 02:20:01 17 02:20:01 19 02:20:11 19 02:20:11 19 02:20:12 20 02:20:20 22 02:20:20 22 02:20:20 22	Kevin Duffy refresh your recollection that Methadone is not used as a matter of policy at the Putnam County Correctional Facility? A. As a matter of policy, Methadone is not used. Q. And in terms of Number 4, "Nurses will monitor inmates on a regular basis during detoxification." Do you see that? A. Yes. Q. What does that require? A. That goes back to the Drug and Alcohoi Flow Sheet that we were talking about. Q. So, this would be only after somebody exhibits a sign or a symptom that a nurse is aware of pertaining to withdrawal? A. Yes. Q. Not before? A. Well, they'd have to be exhibiting some signs or symptoms in order to initiate the process. Q. The nurse would have to be aware, you're saying?
0222:25 2 6221:29 3 0221:11 4 0222:21 5 0221:20 6 0221:20 7 6221:25 8 0221:25 8 0221:25 10 0221:25 11 0221:25 12 0222:25 15 0222:25 16 0222:25 16 0222:25 16 0222:25 17 0222:12 18 02:22:12 18 02:22:12 21 12 22 02:22:25 23 02:22:25 24	Kevin Buffy Q. Prior to November 27th, 2006, how would a nursing staff know if an Inmate had normal vital signs, if that wasn't required? A. The fact that vital signs are not required, does not mean that they are not done. Q. Well, do you know, as a matter of routine practice, if nursing staff did check inmate vital signs at any period of time after they arrived into the facility? A. Well, they would take vital signs if they saw an inmate, for instance, in sick call. If an inmate came in and looked healthy and was not exhibiting any signs and symptoms — in this case of drug withdrawal — but they complained later through the sick-call process, or they utilized the 24-hour access to medical that they have, then at the time the nurse saw them, they would be evaluated; vital signs would be taken. Q. In terms of the following procedures being implemented for addicted inmates, when do those procedures come into play? Is it at intake or something else? A. It can be both.	02:21:41 2 02:20:41 3 02:21:51 4 02:21:51 5 02:23:51 6 02:23:57 8 02:23:57 8 02:23:57 8 02:24:00 9 02:24:01 10 02:24:02 11 02:24:02 12 02:24:03 13 02:24:03 13 02:24:03 15 02:24:03 16 02:24:03 16 02:24:12 17 02:24:13 19 02:24:15 19 02:24:15 19 02:24:15 20 02:24:25 22 02:24:25 22	Kevin Duffy refresh your recollection that Methadone is not used as a matter of policy at the Putnam County Correctional Facility? A. As a matter of policy, Methadone is not used. Q. And in terms of Number 4, "Nurses will monitor inmates on a regular basis during detoxification." Do you see that? A. Yes. Q. What does that require? A. That goes back to the Drug and Alcohoi Flow Sheet that we were talking about. Q. So, this would be only after somebody exhibits a sign or a symptom that a nurse is aware of pertaining to withdrawal? A. Yes. Q. Not before? A. Well, they'd have to be exhibiting some signs or symptoms in order to initiate the process. Q. The nurse would have to be aware, you're saying?

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	Case		cument 23-2	22	Filed 05/07/2008 Page 3 of 35
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Ì		Kevin Dufi,		1	
		to be demonstrating some signs or sy	- I	_	
)		adrawal before the process would be			The state of general and state for
_	_	ed. Otherwise, there wouldn't be any to treat it.		_	4 ever speak with him about Spencer Sinkov?
1 "		Q. And the nurse would have had to ha	QQ:20:47	_	
		dge of that; correct?		_	Q. Did you ever see Exhibit 26?
1		A. Yes.	02.56.27		The regard is to the part of the robbits,
1			08:XE;\$4	8	_
(02/24/45		Q. And the nurse finds out about it, reason of the inmate asking to see the	\$2:26:55		
029+57		or by reason of a correction office:	022647		,
372454 12			U¥ 25 57		
at 24:58 1;		g the nurse? A. Or by the nurse observing the	00:26:Sa		
02:24:56 14			10:27:50		,
02:25:06 18		oms him or herself.	c227.65		THING TOO T
022508 16		2. Do you know if In this case Spencer	02-27:08		- 10 - 10 - 10 - 10 - 10 - 10 - 10 - 10
02:23:10 17		ever asked for any medical assistance? A. I am not aware of that, no.	02:27:00		/ /
522512 18			52:27:00		
02/25/24 19		2. Do you know if in this case any on officer made any observation with	c2.51.12		_ ,
202511 20			. 6223-13		
cassa 21		to signs or symptoms of withdrawal? No.	02:27:17		, - 2 , +
022527 22	_		02:27:19		
022523 23	_	L. Do you know if any nursing staff	02.27.21		· 11 125114) 051
022523, 23 ! 022526 24		ny such observations?	03.27:22		Q. And it appears to say, "Received in
022326 24			022726		
02228 25		, , , , , , , , , , , , , , , , , , , ,	I .	25	A. Yes.
l			era rota		COMPLETE ALL CHARLES AND A CONTRACTOR
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. 1	' that wer	11 Kevin Duffy	4	1	116 Kevin Duffy
62mior Z	_	11 Kevin Duffy Te created with respect to Spencer?	4 02:27:22	2	916 <i>Kevin Duffy</i> Q. (R <i>eading) N</i> ormal gait. Non-
02:79:01 Z	Α	1f Kevin Duffy re created with respect to Spencer? If they're in the medical record, i	4 (4) (4) (7) (4) (7) (4) (7) (7) (7) (7) (7) (7) (7) (7) (7) (7	2	f16 Kevin Duffy Q. (Reading) Normal gait. Non- tremulous. Good spirits, Stats: Feels fine.
020901 Z 020509 3 020835 4	Α	1f Kevin Duffy The created with respect to Spencer? The created with respect to Spencer? The created record, 1 and 1	4 0227/24 0227/25 0227/25	2 3 4	f.16 Kevin Duffy Q. (Reading) Normal gait. Non- tremulous. Good spirits, Stats: Feels fine. It probably should be states, feels fine. Last
02:25:29 3 02:25:29 4 02:25:36 5	A saw the	1f Kevin Duffy The created with respect to Spencer?	4 09:27:29 02:27:32 02:27:40	2 3 4 5	file Kevin Duffy Q. (Reading) Normal gait. Non- tremulous. Good spirits, Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin
02:25:29 3 02:25:29 4 02:25:36 5 02:25:36 6	A saw the	1f Kevin Duffy The created with respect to Spencer? If they're in the medical record, in the medical record as 26 a copy of the Progress Note,	4 (4) (4) (7) (2) (4) (5) (7) (7) (7) (7) (7) (7) (7) (7) (7) (7	2 3 4 5	file Kevin Duffy Q. (Reading) Normal gait. Non- tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor.
0209501 Z 020509 3 020835 4 0202506 5 0202506 6	A saw the	1f Kevin Duffy The created with respect to Spencer? The they're in the medical record, it is MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the	4 0927/24 0227/24 0227/25 0227/40 0227/45	2 3 4 5 6 7	Fig. Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin24 hours ago. Will monitor. Correct?
02/95/27 Z 02/25/29 3 02/25/25 4 02/25/26 5 02/25/26 7 02/25/40 8	A saw the	11 Kevin Duffy The created with respect to Spencer? If they're in the medical record, is the medical record as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6	4 0227:52 0227:52 0227:40 02:27:45 02:27:45	2 3 4 5 6 7 8	Kevin Duffy Q. (Reading) Normal gait. Non- tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes.
02/95/21 Z 02/25/29 3 02/25/25 4 02/25/26 5 02/25/26 6 02/25/27 6 02/25/42 8 02/25/42 8	A saw the	11 Kevin Duffy The created with respect to Spencer? If they're in the medical record, it is: MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Note)	4	2 3 4 5 6 7 8 9	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean?
0209501 Z 0202509 3 0202505 4 0202506 5 0202506 7 0202500 7 0202505 8 0202505 10	A saw the	Kevin Duffy te created with respect to Spencer? If they're in the medical record, it. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit No.	4 0927/24 0227/24 0227/24 0227/25 0227/45 0227/45 0227/45 0227/45	2 3 4 5 6 7 8 9	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented.
0229527 Z 022525 3 022835 4 022536 5 022536 7 022540 7 022540 9 022555 10 022555 11	A saw the	Kevin Duffy The created with respect to Spencer? The they're in the medical record, item. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit No. 5, for id.)	4	2 3 4 5 6 7 8 9	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69.
0209501 Z 0202509 3 0202505 4 0202506 5 0202506 7 0202500 7 0202505 8 0202505 10	A saw the w 20 Q	Kevin Duffy te created with respect to Spencer? If they're in the medical record, it. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit No. 5, for id.) Did you ever speak with Peter Clarke	4 (1977/24) (1927/24) (1927/25) (192	2 3 4 5 6 7 8 9 10	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herion (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the
02/95/21 Z 02/25/25 3 02/25/25 5 02/25/25 6 02/25/25 7 02/25/25 8 02/25/25 10 02/25/25 11 07/26/27 12	A saw the	Kevin Duffy te created with respect to Spencer? If they're in the medical record, it. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Note, as marked as Plaintiff's Exhibit No. 6, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what	4	2 3 4 5 6 7 8 9 10 11 12	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits, Stats: Feels fine. It probably should be states, feels fine. Last used herion (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of
0229507 Z 022525 3 022525 4 022525 5 022525 7 022545 8 022535 10 022535 11 022535 11 022635 12 022635 13 022635 14	A saw the 20 Q about the you've ta	Kevin Duffy The created with respect to Spencer? If they're in the medical record, item. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Notes as marked as Plaintiff's Exhibit Notes, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today?	4 09:77:79 02:27:32 02:27:40 02:27:40 02:27:40 02:27:45 02:27:45 02:27:45 02:27:50 02:28:02	2 3 4 5 6 7 8 9 10 11 12 13	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits, Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were
0209501 Z 0209503 4 0209505 5 0209506 7 0209500 7 0209500 9 0209505 10 0209505 11 0209605 12 0209605 14 0209605 14	A saw the	Kevin Duffy te created with respect to Spencer? If they're in the medical record, it. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit No. 5, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today? No.	4 09:27:24 02:27:25 02:27:40 02:27:45 02:27:45 02:27:45 02:27:45 02:27:55 02:27:55 02:28:52 02:28:52	2 3 4 5 6 7 8 9 10 11 2 13 14 15	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation.
0229507 Z 022525 3 022525 4 022525 5 022525 7 022545 8 022535 10 022535 11 022535 11 022635 12 022635 13 022635 14	A saw the 20 Q about the you've to A. Q.	Kevin Duffy te created with respect to Spencer? If they're in the medical record, it. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Note, as marked as Plaintiff's Exhibit No. 6, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today? No. Did you ever speak with any	4 0227:24 0227:25 0227:45 02:27:45 02:27:45 02:27:45 02:27:45 02:27:45 02:27:45 02:28:50 02:28:50 02:28:50	2 3 4 5 6 7 8 9 10 11 2 13 14 15 16	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits, Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes,
0229507 Z 022525 3 022525 4 022525 5 022525 7 022525 10 022525 10 022525 11 022525 12 022525 14 022525 14 022525 14 022525 14 022525 15	A saw the 20 Q about the you've to A. Q.	Kevin Duffy The created with respect to Spencer? If they're in the medical record, it is. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Note, as marked as Plaintiff's Exhibit Notes, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today? Notes about the intake of Spencer?	4 0227/24 0227/25 0227/25 0227/45 0227/45 0227/45 0227/45 0227/50 0227/50 0227/50 0228/56 0228/56 0228/56 0228/56	2 3 4 5 6 7 8 9 10 11 2 13 14 15 6 7	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes, other than this one pertaining to Spencer Sinkoy?
0229501 2 022535 4 022535 5 022536 5 022536 7 022540 8 022535 10 022535 11 023635 11 023635 12 022535 15 022535 15 022535 15 022535 15	A saw the 20 Q about the you've to Q, correction	Kevin Duffy te created with respect to Spencer? If they're in the medical record, item. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit No. 6, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today? No. Did you ever speak with any notificer about the intake of Spencer? No.	4 0227:24 0227:25 0227:40 0227:40 0227:45 0227:45 0227:45 0227:50 0227:50 0228:52 0228:52 0228:55 0228:55 0228:55 1028:55	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 18	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herion (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes, other than this one pertaining to Spencer Sinkoy? A. If they were in the medical file, I
0229527 2 0229529 3 0229529 4 022536 5 022537 6 022549 8 022549 8 022555 10 022555 11 022655 14 022555 15 022655 15 022655 16 022625 17 022625 18 022625 19	A saw the 20 Q about the you've ta Q, correction A.	Kevin Duffy te created with respect to Spencer? If they're in the medical record, it. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Note, was marked as Plaintiff's Exhibit No. 6, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today? No. Did you ever speak with any nofficer about the intake of Spencer? No. Including Vasaturo?	4 0227:24 0227:25 0227:40 0227:45 0227:45 0227:45 0227:45 0227:45 0227:45 0227:45 0228:25 0228:25 0228:25 0228:25 0228:25 0228:15 0228:15	2 3 4 5 6 7 8 9 10 11 2 13 4 15 6 7 8 9	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits, Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes, other than this one pertaining to Spencer Sinkov? A. If they were in the medical file, I saw them.
0229501 2 0229503 4 0229505 5 0229505 6 0229505 10 0229505 11 0229505 11 0229505 12 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15	A saw the 26 Q about the you've to A. Correction A. Q.	Kevin Duffy The created with respect to Spencer? If they're in the medical record, item. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Note, as marked as Plaintiff's Exhibit Notes for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today? Notes including Vasaturo? Notes Including Vasaturo? Notes Including Vasaturo?	4 0227/24 0227/25 0227/25 0227/45 0227/45 0227/45 0227/45 0227/45 0227/50 0227/50 0228/50	2 3 4 5 6 7 8 9 10 11 2 13 14 5 6 7 8 9 10 11 2 13 14 5 6 7 8 9 10 10 10 10 10 10 10 10 10 10 10 10 10	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits, Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes, other than this one pertaining to Spencer Sinkov? A. If they were in the medical file, I saw them. Q. Did you ever speak with anybody
0229501 2 0229503 4 0229505 5 0229505 6 0229505 10 0229505 11 0229505 11 0229505 12 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15 0229505 15	A saw the 20 Q about the you've to Q. correction Q. A.	Kevin Duffy The created with respect to Spencer? If they're in the medical record, item. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit Notes (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit Notes (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit Notes (Whereupon, 5/20/06 Progress Note	4 0227:24 0227:25 0227:40 0227:40 0227:45 0227:45 0227:45 0227:50 0228:52	2 3 4 5 6 7 8 9 10 11 2 13 14 5 6 7 8 19 10 11	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes, other than this one pertaining to Spencer Sinkov? A. If they were in the medical file, I saw them. Q. Did you ever speak with anybody about what, if anything, Paul I'm sorry Peter
0229527 2 0229529 3 0229529 4 0229529 5 0229529 8 0229529 10 0229539 11 0229539 12 0229539 15 0229539 15 0229539 16 0229539 16 0229539 17 0229529 18 0229529 19 0229529 21 1 22	A saw the 20 Q about the you've to A. Q. Correction A. Q. A. Q. A.	Kevin Duffy the created with respect to Spencer? If they're in the medical record, item. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit No. 6, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today? No. Did you ever speak with any nofficer about the intake of Spencer? No. Including Vasaturo? No. Did you ever speak with him at all? I probably know who Vasaturo is,	4 0227:24 0227:25 0227:40 0227:45 0227:45 0227:45 0227:45 0227:45 0227:45 0227:45 0227:45 0227:45 0228:55 1	2 3 4 5 6 7 8 9 10 11 2 13 14 15 6 7 8 9 10 11 2	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes, other than this one pertaining to Spencer Sinkov? A. If they were in the medical file, I saw them. Q. Did you ever speak with anybody about what, if anything, Paul I'm sorry Peter Clarke did to monitor, as indicated in his
622525 2 2 622525 2 3 622525 2 10 622525 10 622525 11 622525 15 62	A saw the 20 Q about the you've to A. Q. Correction A. Q. A. Q. A.	Kevin Duffy The created with respect to Spencer? If they're in the medical record, item. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Note, which has a Plaintiff's Exhibit Notes as marked as Plaintiff's Exhibit Notes, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today? Notes Notes about the intake of Spencer? Notes Including Vasaturo? Notes Did you ever speak with him at all? I probably know who Vasaturo is, secondate a name and a face.	4 0227:24 0227:25 0227:45 0227:45 0227:45 0227:45 0227:45 0227:45 0228:50 0228:51 0228:52 0228:52 0228:52 0228:52 0228:52 0228:52 0228:53 0228:53 0228:53 0228:53 0228:53	2 3 4 5 6 7 8 9 10 11 2 13 4 5 6 7 8 9 10 11 2 13 4 5 6 7 8 9 10 11 2 3	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes, other than this one pertaining to Spencer Sinkov? A. If they were in the medical file, I saw them. Q. Did you ever speak with anybody about what, if anything, Paul I'm sorry Peter Clarke did to monitor, as indicated in his Progress Note - "Will monitor"?
02/95/27 2 02/25/25 3 02/25/25 4 02/25/25 5 02/25/25 6 02/25/25 10 02/25/25 11 02/25/25 14 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15	A saw the 20 Q about the you've ta Q. Correction A. Q. A. I can't a Q.	Kevin Duffy The created with respect to Spencer? If they're in the medical record, item. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit Notes (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit Notes (Whereupon, 5/20/06 Progress Notes marked as Plaintiff's Exhibit Notes (Whereupon, 5/20/06 Progress Note	4 0227:24 0227:25 0227:40 0227:40 0227:45 0227:45 0227:45 0227:45 0227:45 0227:50 0227:50 0228:02 0228:02 0228:02 0228:02 0228:03	2 3 4 5 6 7 8 9 10 11 2 13 4 15 6 7 8 9 10 11 2 3 4 4	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes, other than this one pertaining to Spencer Sinkov? A. If they were in the medical file, I saw them. Q. Did you ever speak with anybody about what, if anything, Paul I'm sorry Peter Clarke did to monitor, as indicated in his Progress Note - "Will monitor"? A. No.
02/95/27 2 02/25/25 3 02/25/25 4 02/25/25 5 02/25/25 6 02/25/25 10 02/25/25 11 02/25/25 14 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 15 02/25/25 25 02/25/25 25 02/25/25 25 02/25/25 25	A saw the 20 Q about the you've ta Q. Correction A. Q. A. I can't a Q.	Kevin Duffy The created with respect to Spencer? If they're in the medical record, item. MS. BERG: Let me have marked as 26 a copy of the Progress Note, which has the date 5/20/06 on the bottom right-hand written number 6 (Whereupon, 5/20/06 Progress Note, which has a Plaintiff's Exhibit Notes as marked as Plaintiff's Exhibit Notes, for id.) Did you ever speak with Peter Clarke e intake of Spencer, other than what estified to here already today? Notes Notes about the intake of Spencer? Notes Including Vasaturo? Notes Did you ever speak with him at all? I probably know who Vasaturo is, secondate a name and a face.	4 0227:24 0227:25 0227:40 0227:45	2 3 4 5 6 7 8 9 10 11 2 13 4 15 6 7 8 9 10 11 2 3 4 4	Kevin Duffy Q. (Reading) Normal gait. Non-tremulous. Good spirits. Stats: Feels fine. It probably should be states, feels fine. Last used herlon (sic) probably should be heroin 24 hours ago. Will monitor. Correct? A. Yes. Q. What does "AEO" mean? A. Alert and oriented. Q. And the bottom right, the number 69. I'm going to tell you that that pertains to the numbering that the New York State Commission of Correction put on the documents that were provided to it as part of its investigation. Did you ever see any Progress Notes, other than this one pertaining to Spencer Sinkov? A. If they were in the medical file, I saw them. Q. Did you ever speak with anybody about what, if anything, Paul I'm sorry Peter Clarke did to monitor, as indicated in his Progress Note - "Will monitor"?

	Case 7:07-cv-02866-CS-GAY Documer	nt 23-22	Filed 05/07/2008 Page 4 of 35
		1	
02:28:35	anybody to monitor Spencer?	02:31:27 2	A. No.
02:23:24 3	A. No.	G2:21.89 3	
-46 4	MS. BERG: I'm going to have	023540 4	
, ., 5	marked as Exhibit 27 a copy of a	02:31:42 5	
92:28:50 6	Progress Note which is for the same	02:31:42 6	Q. Did you ever speak with her about
62:20tl 7	date, has additional notes, and	02:01:44 7	
02:28:53 8	does not have the handwritten number on	923/014 8	A. Not that I recall.
97:21:03 9	the bottom right corner.	02:21:45 9	Q. Did Susan Waters ever indicate to
62:20:20 10	(Therespon, b) 20/ 00 F10gress Note	020150 10	you, in words or in substance, that she went back
.0229.02 11	was marked as Plaintiff's Exhibit No.	0231:53 11	to the Progress Notes and added something after
0225:02 12	27, for Id.)	F2:31:55 12	Spencer had committed suicide?
02:29:20 13		023199 13	A. No.
czzeni 14	before? (Handing)	0231-59 14	Q. Are there any policies or procedures
022945 15	A. Yes.	023202 15	
1 022500 15	Q. Do you recall when for the first	0232:13 16	A. I can't think of any specific
02:28:32 17	time?	\$2:32:15 17	,
c229x2 18	A. No.	023219 18	Q. Are there any policies and
022842 19	Q. Do you recall under what circumstances?	020219 19	procedures that you're aware of with respect to
022846 20	A. It would have been in review of the	E03221 20	who can stop CPR?
ээлэг 21 сгаял 22	medical record following Mr. Sinkov's death.	C2222 21	A. No.
022854 23	Q. Do you recall if you or anybody from	C2972+ 22	Q. Or under what circumstances it can
©22650 24	AmeriCor provided this Progress Note, Exhibit 27, to the State Commission?	±=== 23	be stopped?
φ _{230,00} 25	A. I don't know who provided the	24 ar	A. No.
1 423030 20	COMPU-TRAN SHORTHAND REPORTING	62:1227 25	Q. Were you aware that Spencer was
			COMPU-TRAN SHORTHAND REPORTING
1	118 Kevin Duffy	1	. 120
1 0230:07 2	118	1 02:2202 2	. 120 Kevin Duffy
1 02:30:97 2 02:20:10 3	118 Kevin Duffy	1 _	120 Kevin Duffy placed on a fifteen-minute supervisory check?
1 _	118 Kevin Duffy records to the Commission.	02:32:02 2	120 Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes.
02:20:10 3	118 Kevin Duffy records to the Commission. Q. Did you?	02:12:05 3	fevin Duffy Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes.
62:20:10 3	### Kevin Duffy *records to the Commission. Q. Did you? A. No.	02:12:32 2	120 Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that
02:20:10 3 62:00:10 4 62:00:17 5	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27	02:12:02 2 02:12:05 3 02:12:06 4 02:32:07 5	120 Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination?
02:20:10 3 02:20:10 4 02:20:17 5 02:30:14 6	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them?	02:32:32 2 02:32:35 3 02:32:35 4 02:32:37 5 92:32:37 6	### 120 **Kevin Duffy placed on a fifteen-minute supervisory check? **A. Yes. **Q. Do you know who made that determination? **A. No.
02:20:10 3 02:20:10 4 02:20:17 5 02:30:14 6 02:20:15 7	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't	02:12:32 2 02:12:35 3 02:12:36 4 02:12:37 5 92:32:37 6 02:32:35 7	### 120 Kevin Duffy
02:20:10 3 02:20:10 4 02:20:14 5 02:20:14 6 02:20:15 7 02:20:15 8 02:20:15 9 04:20:25 10	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to	02:12:02 2 02:12:05 3 02:12:05 4 02:32:07 5 02:32:07 6 02:32:07 7 02:32:05 7	### Acceptable of the Company of the
02:20:10	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes?	02:12:02	// Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a
0220010 3 020010 4 020010 5 023014 6 021015 7 020015 8 020015 9 040025 10 020026 11 022026 12	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general	02:12:02	// Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check?
0220210 3 020010 4 020017 5 023034 6 023035 7 020045 8 020045 9 043065 10 022028 11 022028 11	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever	02:12:32 2 02:12:35 4 02:32:37 5 02:32:37 6 02:32:37 6 02:32:35 7 07:32:41 8 02:32:43 9 02:32:43 10 02:32:43 11 02:32:51 12 02:32:53 13	Revin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall.
02:20:10 3 62:20:10 4 62:20:10 5 62:20:15 7 62:20:15 8 62:20:15 9 60,50:25 10 62:20:28 11 62:20:28 12 62:20:28 12 62:20:28 12 62:20:28 14	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured,	02:12:32 2 02:12:35 3 02:12:36 4 02:32:37 6 02:32:37 6 02:32:37 7 07:32:41 8 02:32:43 10 02:32:43 10 02:32:43 11 02:32:43 12 02:32:43 13 02:32:44 14	Revin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is
02:20:10	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the	02:12:02 2 02:12:05 3 02:12:05 4 02:12:07 6 02:12:07 6 02:12:07 8 02:12:07 10 02:12:07 11 02:12:07 11 02:12:07 12 02:12:07 13 02:12:04 14 02:12:05 15	Revin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo,
02:20:10 3 02:20:10 4 02:20:10 5 02:20:14 6 02:20:15 8 02:20:15 9 04:20:25 10 02:20:28 11 02:20:28 11 02:20:28 14 02:20:43 13 02:20:43 14 02:20:46 15	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting.	02:12:32 2 02:12:35 4 02:12:36 4 02:32:37 6 02:32:35 7 07:32:41 8 02:32:35 10 02:32:37 11 02:32:37 11 02:32:37 12 02:32:37 13 02:32:37 14 02:32:57 15 02:32:37 16	Revin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons way Spencer was on
02:20:10 3 62:20:10 4 62:20:14 6 62:20:15 8 62:20:15 9 64:20:26 10 62:20:26 11 62:20:26 12 62:20:26 14 62:20:26 15 62:20:26 15 62:20:26 15	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting. Q. And in terms of the Progress Note,	02:12:32 2 02:12:35 3 02:12:36 4 02:32:37 6 02:32:37 6 02:32:37 7 07:02:41 8 02:32:42 10 02:32:43 10 02:32:43 10 02:32:43 12 02:32:43 13 02:32:43 14 02:32:43 15 02:32:44 16 02:33:47 17	Revin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons why Spencer was on the 15-minute check?
02:20:10 3 02:20:10 4 02:20:10 5 02:30:14 6 02:30:15 8 02:30:15 9 04:30:25 10 02:30:26 11 02:30:26 12 02:30:26 14 02:30:26 15 02:30:26 16 02:30:26 16 02:30:26 17 72:30:14 18	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting. Q. And in terms of the Progress Note, Exhibit 27, it appears to have, at least at the	02:12:02 2 02:12:05 3 02:12:05 4 02:12:07 6 02:12:07 6 02:12:07 8 02:12:07 10 02:12:07 11 02:12:07 12 02:12:07 13 02:12:04 14 02:12:04 16 02:13:04 16 02:13:04 17 02:13:04 18	Revin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons why Spencer was on the 15-minute check? A. I don't recall seeing this document
02:20:10 3 62:20:10 4 62:20:10 5 62:20:14 6 62:20:15 7 62:20:15 8 62:20:15 10 62:20:26 11 62:20:26 11 62:20:26 14 62:20:26 15 62:20:26 15 62:20:26 15 62:20:26 15 62:20:26 15	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting. Q. And in terms of the Progress Note, Exhibit 27, it appears to have, at least at the top, it was photocopled with Nurse Clarke's	02:12:02 2 02:12:05 3 02:12:05 4 02:12:07 6 02:12:07 6 02:12:07 8 02:12:07 10 02:12:07 11 02:12:07 11 02:12:07 12 02:12:07 13 02:12:07 15 02:12:07 17 02:13:10 18 02:13:17 19	Revin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons why Spencer was on the 15-minute check? A. I don't recall seeing this document before.
022010 3 620010 4 620010 5 523014 6 623015 7 623015 8 623015 9 64,567 10 623028 11 623033 12 623035 14 623168 16 623168 16 6231108 16 623111 17 723114 18 623111 19 623121 20	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever causa, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting. Q. And in terms of the Progress Note, Exhibit 27, it appears to have, at least at the top, it was photocopled with Nurse Clarke's entry, and then added to; correct?	02:12:32 2 02:12:35 4 02:12:37 5 02:12:37 6 02:12:37 6 02:12:37 10 02:12:31 10 02:12:31 11 02:12:31 12 02:12:31 13 02:12:31 14 02:12:31 15 02:12:31 16 02:12:31 17 02:13:31 18 02:13:37 19 02:33:24 20	Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons why Spencer was on the 15-minute check? A. I don't recall seeing this document before. Q. Do you recall any conversations with
02:20:10 3 02:20:10 4 02:20:10 5 02:30:14 6 02:30:15 8 02:30:15 9 04:30:25 10 02:30:26 11 02:30:26 12 02:30:26 15 02:30:26 15 02:30:26 16 02:30:26 16 02:30:27 19 02:30:21 20 02:30:21 20	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting. Q. And in terms of the Progress Note, Exhibit 27, it appears to have, at least at the top, it was photocopled with Nurse Clarke's entry, and then added to; correct? A. I can't tell that from here, but	02:12:32 2 02:12:35 4 02:32:37 5 92:32:37 6 02:32:37 6 02:32:37 7 07:32:41 8 02:32:42 10 02:32:42 11 02:32:42 11 02:32:42 12 02:32:42 14 02:32:42 15 02:33:42 16 02:33:47 17 02:33:40 18 02:33:47 19 02:33:27 21	Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons why Spencer was on the 15-minute check? A. I don't recall seeing this document before. Q. Do you recall any conversations with Richard DiMattio about Spencer?
02:20:10 3 02:20:10 4 02:20:10 5 02:30:14 6 02:30:15 7 02:30:15 8 02:30:15 9 04:30:25 10 02:20:28 11 02:20:28 11 02:20:28 14 02:20:28 14 02:20:28 15 02:20:10 16 02:20:11 17 02:20:14 18 02:20:21 20 02:20:24 21 5 22	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting. Q. And in terms of the Progress Note, Exhibit 27, it appears to have, at least at the top, it was photocopled with Nurse Clarke's entry, and then added to; correct? A. I can't tell that from here, but okay.	02:12:02 2 02:12:05 3 02:12:05 4 02:12:07 6 02:12:07 6 02:12:07 8 02:12:07 10 02:12:07 11 02:12:07 11 02:12:07 12 02:12:07 15 02:12:07 17 02:13:17 19 02:13:17 19 02:13:17 19 02:13:17 21 12:13:20 22	Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons why Spencer was on the 15-minute check? A. I don't recall seeing this document before. Q. Do you recall any conversations with Richard DiMattio about Spencer? A. I'm sure that we discussed it,
02:20:10 3 02:20:10 4 02:20:10 5 02:30:14 6 02:30:15 8 02:30:15 9 04:30:25 10 02:30:26 11 02:30:26 12 02:30:26 15 02:30:26 15 02:30:26 16 02:30:26 16 02:30:27 19 02:30:21 20 02:30:21 20	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting. Q. And in terms of the Progress Note, Exhibit 27, it appears to have, at least at the top, it was photocopled with Nurse Clarke's entry, and then added to; correct? A. I can't tell that from here, but okay. Q. Do you have any understanding as to	02:12:32 2 02:12:35 3 02:12:36 4 02:12:37 5 92:12:37 6 02:12:37 6 02:12:37 10 02:12:31 10 02:12:31 10 02:12:31 11 02:12:31 12 02:12:31 13 02:12:31 15 02:13:31 16 02:13:31 17 02:13:31 18 02:13:31 19 02:13:22 20 02:13:25 23	Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons why Spencer was on the 15-minute check? A. I don't recall seeing this document before. Q. Do you recall any conversations with Richard DiMattio about Spencer? A. I'm sure that we discussed it, Q. Do you recall anything that you said
0220010 3 620010 4 620010 5 523014 6 623015 7 623015 8 623015 9 64,567 10 622028 11 623039 12 623038 14 623043 15 623108 16 623110 17 723114 18 623041 19 623124 20 623124 21 5 22 623322 23	Revin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting. Q. And in terms of the Progress Note, Exhibit 27, it appears to have, at least at the top, it was photocopled with Nurse Clarke's entry, and then added to; correct? A. I can't tell that from here, but okay. Q. Do you have any understanding as to when Susan Waters made the entry right below	02:12:32 2 02:12:35 4 02:32:37 5 92:32:37 6 02:32:37 6 02:32:37 10 02:32:47 11 02:32:47 11 02:32:47 12 02:32:47 14 02:32:47 15 02:33:47 17 02:33:40 18 02:31:17 19 02:33:24 20 02:31:27 21 12:33:20 22 02:31:37 24	Kevin Duffy placed on a lifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons why Spencer was on the 15-minute check? A. I don't recall seeing this document before. Q. Do you recall any conversations with Richard DiMattio about Spencer? A. I'm sure that we discussed it, Q. Do you recall anything that you said or that he said, either specifically or in
022010 3 020010 4 022010 5 023014 6 023015 7 023015 8 023015 10 023028 11 023028 12 023028 14 023026 15 023108 16 020111 17 023114 18 023114 18 023114 19 023121 20 023124 21 5 22 023126 23	Kevin Duffy records to the Commission. Q. Did you? A. No. Q. Do you know if, in fact, Exhibit 27 was ever sent to them? A. No. Q. Do you have any explanation as to why the Progress Note, Exhibit 26, doesn't contain, as Exhibit 27 does, the additional notes? A. Not specifically; but under general procedure, when an inmate dies for whatever cause, the medical record is immediately secured, and that might happen before the person on the shift is finished documenting. Q. And in terms of the Progress Note, Exhibit 27, it appears to have, at least at the top, it was photocopled with Nurse Clarke's entry, and then added to; correct? A. I can't tell that from here, but okay. Q. Do you have any understanding as to	02:12:32 2 02:12:35 3 02:12:36 4 02:12:37 5 92:12:37 6 02:12:37 6 02:12:37 10 02:12:31 10 02:12:31 10 02:12:31 11 02:12:31 12 02:12:31 13 02:12:31 15 02:13:31 16 02:13:31 17 02:13:31 18 02:13:31 19 02:13:22 20 02:13:25 23	Kevin Duffy placed on a fifteen-minute supervisory check? A. Yes. Q. Do you know who made that determination? A. No. Q. Do you know if AmeriCor staff participated in that determination? A. No. Q. Did anybody ever explain to you any reason or reasons why Spencer was placed on a fifteen-minute supervisory check? A. Not that I recall. Q. Did you ever see Exhibit 4, which is a memorandum done by Correction Officer Vasaturo, listing the reason or reasons why Spencer was on the 15-minute check? A. I don't recall seeing this document before. Q. Do you recall any conversations with Richard DiMattio about Spencer? A. I'm sure that we discussed it, Q. Do you recall anything that you said

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1	127 1 Kevin Dir	ļ	123
	1 Kevin Du. 2 A. No.		1 Kevin Duffy
02:33:2		02:36:54	2 marked as Plaintiff's Exhibit No. 28,
	7	02/25/19	3 for id.)
'	- foot memory.		4 Q. Do you recognize Exhibit 28?
i .	- 1 The result of The Post file Me	02:36::8	5 (Handing)
	6 discussed it over the phone following	02:38:24	6 A. Yes.
02:23:50 6	7 Mr. Sinkov's death; but when they occurred, and	02:36:24	 Q. Is that the initial Policy Manual
C2:33.95 &	The state of the s	CZ:0R29 (B that you drafted?
02:34:00 S	Samuel Company of White was had had be to as, no.	0≥56:35 S	A. Yes.
∮ o≥a+xs 10	The same and the subsequence	92:36:32 1 (Q. And did you do that at some point in
62:34:07 11	The country of the country of	023834 17	time in July or August of 2003?
02:34:09 12	The street with the die eduncy, aid	02:36:30 12	A. Yes.
02:34:52 13	,	922643 1 3	Q. And if you flip through, just
cz:54:16 14		023047 14	generally, the specific policies that are
0224:15 15	provided?	rassess 15	included, they actually have a date on the top of
2020-20 16	A. No.	222835 16	
C2:54:10 17	The last season is any and tellemen	02395# 17	A. Yes.
02:34:24 18	, , sil elle 3011¢ 36, vice3	02:56:58 18	Q. Turn, if you would, to the page
020427 19	to be provided that you listed in connection with	020505 19	
G≥0#29 20	the 2003 contract?	0207:02 20	
0222434 21	 Except where the contract was 	w237039 21	Q. "Procedure: Receiving Screening."
020402 22	amended, yes.	9207:12 22	
62:04:03 23	Q. And in the case of the amendments	07:37:12 23	A. Yes.
022427 24	that were indicated right in the face of the	02;37:15 24	Q. Was that still in effect as of
e2.34.28 25	contract, correct, such as with the mental health	4207-rs 25	
į	COMPU-TRAN SHORTHAND REPORTING	İ	COMPU-TRAN SHORTHAND REPORTING
	122	"	124
.1	Kevin Duffy	1	Kevin Duffy
G2:34:43 2	services?	02:97:27 2	A. I don't know. Probably.
0Z:34:43 3	A. As I recall, the amendments were	222724 3	Q. Do you know of any changes that were
Фэнзя 4	taken care of through correspondence from me to	6207:07 4	made to this policy from 2003?
C2:34:57 5	the county, and then those letters were	ω:s7;e0 5	A. I don't remember any.
02:34:54 6	incorporated as a part of the addendum that	e20794 6	Q. It says at the bottom paragraph, "If
02:04:59 7	renewed the contract.	02:37:50 7	the inmate is medically stable but requires
G2:33:00 8	Q. And with respect to the initial	TZ:37:50 8	medical follow up; e.g., intoxicated but subject
02:05:00 9	services, the outline that's before you just	 czarz= 5	to going into withdrawal." It continues, "The
22.35 (Z 10	give me the exhibit number on that.	02:59:00:10	nurse will accept the Inmate, document the
C2-35/14 11	A. This one? (Indicating)	92:3a:92 11	medical condition in the inmate's medical record:
02,05:15 12	Q. Yes.	020LC5 12	and depending on the inmate's medical problem,
92.05ds 13	A. Twenty-five.	0201:01 13	either contact the physician for orders or
9200:15 14	Q as Exhibit 25, was there any	oz.so:10 14	schedule the inmate to be seen at the next
0205:1a 15	removal, if you will, of any of those provisions?	620mrz 15	physician's sick call."
ozaze 16	A. No.	0232:19 16	, ·
ez:36:24 17	MS. BERG: I'm going to have	te:20:16 17	Do you see that? A. Yes.
020526 18	marked as the next exhibit, 28,	02:30:10 17 02:30:15 18	
50-50-00 19	AmeriCor, Inc. procedure Manual,	02:3815 13 00:38:11 19	
022031 20	Putnam County Correctional Facility,	19 1920 20 20	A. The sick call is when the physician
020500 21	DOOD INTO DO		comes in and sees inmates based on the list of
1 22	No. 1 eee	02JERF 21	the people that are referred to him that we
02:35:42 23		ω _{31/28} 22	talked about earlier.
92:36:49 24	·	23 at 24	Q. And that would be the list that
©3552 25			
-6-2-27 F-6-3	Procedure Manual, Putnam County Correctional Sacrific 2003, www.	02:38:94 24	includes those inmates who request to be seen, as
	Converte Le management		well as those who nursing staff believe the COMPU-TRAN SHORTHAND REPORTING

	Case 7:07-cv-02866-CS-GAY Dogumer	t 23-22	Filed 05/07/2008 Page 6 of 35
!	1 Kevin Du. 125		127
0≥34:4=	2 physician should see?	ļ	Kevin Duffy
(02:35:42		00/40/40 2	2/20/44/7100 to 4100 p.mi. Smit.
	- TO TE WOOM NOT HECESSATILY	52×3×4 3	(V/hereupon, two-page 5/20/06 Shift
1. 54	 4 include inmates who requested to be seen by the 5 physician, but it would include those that the 	102=0,55 4	TO THE STATE OF TH
	1 Warren A warre to transfer the Files file	±240;≤6 5	1707 25,751 101,9
02:38:53	and the baysician to see.	6241:29 6	To see the contract of the former, in
2 02:20:55	The color of the color which sick call was	∞+120 7	garanty to tride the Sintereport dide you
02:35:57		D2:41:25 8	testified about earlier?
0239:01	-	02410# 9	A. Yes.
1	Q. Do you know if it was on set days?	12:11:26 10	 Q. And the second page, is that part of
023205 1		C2241:20 11	the shift report, as well?
02:39:08 1	and the property of the physicians	0243:50 12	 A. It's the back of the front page,
02:39:09 1		2241△2 13	It's a two-sided form.
02:05:05 1	io example, opened	G2x1.34 14	${f Q}_i$. And is the nurse required to
02039:15	mer elle liexe sick can was:	024436 15	complete both sides before leaving his or her
022815		92x1138 76	shift?
02:35:1a 1	and anyouth ever indicate to you, if	02 41:60 17	A. Yes.
323321 1	and an experiment of the tries periode 3 periods	22:4:30 18	Q. In terms of the first page, do you
02:35:24 1	9 was subject to going into withdrawal?	02341.46 19	see that It's Sue Waters' Shift Report for 7:30
020826 2 1		0241:52 20	to 4:00 p.m.?
22:39.25 2*	a. It is with a dilybody ever	02:41:53 21	A. Yes.
020828 2 2	, , , and a parenting co	02x1:53 22	Q. There's nothing noted on there about
02:35:31 23	3 Spencer?	024926 23	her seeing Spencer Sinkov; correct?
CROBOZ 24	A. No.	C2:4159 24	A. No.
020332 25	Q. Do you know if anybody scheduled him	0221:99 25	Q. And on the second, or the back side,
	• • • • • • • • • • • • • • • • • • • •		
	COMPU-TRAN SHORTHAND REPORTING		and the state of t
		 	COMPU-TRAN SHORTHAND REPORTING
	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy	1	and the state of t
1 02300+ 2	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call?	1 02:42:01 2	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy
02:30:34 Z	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy		COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy if you will, which is Bates stamped 50 at the
02:19:08 3 02:08:28 4	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it	02:42-01 2	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy
02:19:38 3	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be	02:42:01 2 62:42:05 3	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page;
02:19:08 3 02:08:28 4	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in	02:42:01 2 02:42:05 3 02:42:07 4	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct.
02:29:38 3 02:39:38 4 02:39:46 5	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in	02:42:05 3 02:42:05 4 02:42:08 5	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct. Q. Under the section "Matters that need
02:19:05 3 02:03:23 4 02:03:46 5 02:04:01 6	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in the History and Physical logbook.	02:42:01 2 02:42:05 3 02:42:07 4 02:42:08 5 02:42:08 6	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct. Q. Under the section "Matters that need to be followed up," did you ever see any Shift
02:1908 3 02:0828 4 02:0846 5 02:0940 6	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in the History and Physical logbook. Do you see that?	02:42:01 2 02:42:05 3 02:42:07 4 92:42:08 5 02:42:08 6 02:42:01 7	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct. Q. Under the section "Matters that need
02:19:08	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in the History and Physical logbook. Do you see that? A. Yes. Q. Is the History and Physical logbook	02:42:01 2 02:42:05 3 02:42:07 4 02:42:08 5 02:42:08 6 02:42:11 7 02:42:12 8	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct. Q. Under the section "Matters that need to be followed up," did you ever see any Shift Report which indicated that Spencer in any way
02:1908 3 02:09:08 4 02:09:06 5 02:09:01 6 02:09:04 7 02:00:08 8	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in the History and Physical logbook. Do you see that? A. Yes.	02:42:01 2 02:42:07 4 02:42:08 5 02:42:08 6 02:42:01 7 02:42:12 8 02:42:17 9	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct. Q. Under the section "Matters that need to be followed up," did you ever see any Shift Report which indicated that Spencer in any way needed to be followed up? A. Not that I recall.
02:19:08 3 02:09:08 4 02:09:06 5 02:09:01 6 02:09:04 7 02:09:08 8 02:09:08 3 02:09:08 10 02:40:08 11	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in the History and Physical logbook. Do you see that? A. Yes. Q. Is the History and Physical logbook something that actually exists? A. Yes.	02:42:01 2 02:42:02 4 02:42:03 5 02:42:03 6 02:42:01 7 02:42:02 8 02:42:03 10	COMPU-TRAN SHORTHAND REPORTING 128 Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct. Q. Under the section "Matters that need to be followed up," did you ever see any Shift Report which indicated that Spencer in any way needed to be followed up? A. Not that I recall. MS. BERG: I'm going to have
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02:19:08 3 02:08:08 4 02:08:08 5 02:08:08 7 02:08:08 8 02:08:08 9 02:08:08 10 02:46:02 11 02:46:02 11 02:46:02 12 02:46:07 14	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in the History and Physical logbook. Do you see that? A. Yes. Q. Is the History and Physical logbook something that actually exists? A. Yes. Q. Where is that maintained? At the jail? A. At the nurses' station. MS. BERG: I'm going to call	024241 2 024208 3 024208 5 024208 6 024211 7 024212 8 024212 8 024212 10 024222 11 024222 12 024231 13 024231 14	COMPU-TRAN SHORTHAND REPORTING Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct. Q. Under the section "Matters that need to be followed up," did you ever see any Shift Report which indicated that Spencer in any way needed to be followed up? A. Not that I recall. MS. BERG: I'm going to have marked as Exhibit 30 a copy of an AmeriCor, Inc. Policy Manual for the Putnam County Correctional Facility, November, 2004.
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02:19:08 3 02:09:28 4 02:09:46 5 00:09:41 6 02:09:44 7 02:09:45 9 02:09:45 10 02:40:45 12 02:40:45 13 02:40:47 14 02:40:47 15 02:40:41 16	COMPU-TRAN SHORTHAND REPORTING 126 Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in the History and Physical logbook. Do you see that? A. Yes. Q. Is the History and Physical logbook something that actually exists? A. Yes. Q. Where is that maintained? At the jail? A. At the nurses' station. MS. BERG: I'm going to call	02:42:01 2 02:42:02 4 02:42:03 5 02:42:03 6 02:42:01 7 02:42:02 8 02:42:03 10 02:42:03 11 02:42:03 12 02:42:03 14 02:42:03 15 02:42:03 15	COMPU-TRAN SHORTHAND REPORTING Kevin Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct. Q. Under the section "Matters that need to be followed up," did you ever see any Shift Report which indicated that Spencer in any way needed to be followed up? A. Not that I recall. MS. BERG: I'm going to have marked as Exhibit 30 a copy of an AmeriCor, Inc. Policy Manual for the Putnam County Correctional Facility, November, 2004. (Whereupon, AmeriCor, Inc. Policy Manual, Putnam County Correctional
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02:19:08 3 02:09:28 4 02:09:06 5 02:09:24 7 02:09:28 8 02:09:28 10 02:09:28 10 02:09:28 12 02:40:08 12 02:40:07 15 02:40:07 15 02:40:07 15 02:40:10 17 02:40:12 18 02:40:12 18 02:40:12 18 02:40:12 19 02:40:13 20 02:40:20 21	COMPU-TRAN SHORTHAND REPORTING Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in the History and Physical logbook. Do you see that? A. Yes. Q. Is the History and Physical logbook something that actually exists? A. Yes. Q. Where is that maintained? At the jail? A. At the nurses' station. MS. BERG: I'm going to call for production of the History and Physical logbook for May 19th and May 20, 2006. MR. COON: I'll take it under advisement. DOCUMENT/DATA REQUESTED:	02:42:01 2 02:42:02 4 02:42:03 5 02:42:03 6 02:42:03 6 02:42:03 7 02:42:03 10 02:42:03 11 02:42:03 12 02:42:03 14 02:42:03 15 02:42:03 15 02:42:03 16 02:42:03 17 02:42:03 18 02:42:03 19 02:43:03 20 02:43:03 20 02:43:03 20	Item Duffy if you will, which is Bates stamped 50 at the bottom, there's no notes at all on that page; correct? A. Correct. Q. Under the section "Matters that need to be followed up," did you ever see any Shift Report which indicated that Spencer in any way needed to be followed up? A. Not that I recall. MS. BERG: I'm going to have marked as Exhibit 30 a copy of an AmeriCor, Inc. Policy Manual for the Putnam County Correctional Facility, November, 2004. (Whereupon, AmeriCor, Inc. Policy Manual, Putnam County Correctional Facility, 2004, was marked as Plaintiff's Exhibit No. 30, for Id.) Q. Do you recognize Exhibit 30? (Handing) A. Yes.
02:19:08 3 02:09:28 4 02:09:46 5 02:09:54 7 02:09:58 8 02:09:58 10 02:09:58 12 02:40:08 12 02:40:07 15 02:40:07 15 02:40:10 17 02:40:10 17 02:40:10 17 02:40:10 17 02:40:10 17 02:40:10 17 02:40:10 17 02:40:10 17 02:40:10 21 13 22	COMPU-TRAN SHORTHAND REPORTING Kevin Duffy to be seen at the next physician's sick call? A. No. Q. The next page, on the bottom, it refers to, "All Receiving Screenings are to be documented, both on the Shift Report form and in the History and Physical logbook. Do you see that? A. Yes. Q. Is the History and Physical logbook something that actually exists? A. Yes. Q. Where is that maintained? At the jail? A. At the nurses' station. MS. BERG: I'm going to call for production of the History and Physical logbook for May 19th and May 20, 2006. MR. COON: I'll take it under advisement. DOCUMENT/DATA REQUESTED: MS. BERG: Can we have	02:42:01 2 02:42:08 3 02:42:08 5 02:42:08 6 40:42:01 7 02:42:08 8 02:42:01 8 02:42:01 10 02:42:01 11 02:42:01 12 02:42:01 13 02:42:01 14 02:42:01 15 02:42:01 16 02:42:01 17 02:42:01 18 02:42:01 18 02:42:01 20 02:43:01 20 02:43:01 20 02:43:01 20	Item Services at all on that page; correct? A. Correct. Q. Under the section "Matters that need to be followed up," did you ever see any Shift Report which indicated that Spencer in any way needed to be followed up? A. Not that I recall. MS. BERG: I'm going to have marked as Exhibit 30 a copy of an AmeriCor, Inc. Policy Manual for the Putnam County Correctional Facility, November, 2004. (Whereupon, AmeriCor, Inc. Policy Manual, Putnam County Correctional Facility, 2004, was marked as Plaintiff's Exhibit No. 30, for Id.) Q. Do you recognize Exhibit 30? (Handing) A. Yes. Q. Is that another Policy Manual that
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	Case 7:07-cv-02866-CS-GAY Docum	nent 23-22	Filed 05/07/2008 Page 7 of 35
-	1 Kovin But	ļ	: 131
	NEVIII DUIII	1	Kevin Duffy
02:49:25	- ALDS DIGG STORED III OF BROOK	m2:45:48 2	A. And it was three —
02:43:27	3 November, 2004?	cz:45%3 3	Q. 388. "Communication on Special
'20	4 A. Yes. 5 Q. Bo you recall why this was issued or	nzessa 4	Reeds Inmates."
و.	# 00 \00 (CCCIII 1111) Et 10 W02 (220EQ 07	Q2:45:50 5	A. Okay.
59:42:33	_	62:40:54 6	Q. It says, "Effective date: May 11,
]		03:44:55 7	'03. Revised: November 15, '04;" correct?
}	- " Town of the master of accreditation ferman,	Q2,45,59 8	A. Yes.
l	A. And were these buildes actually	02:52:55 9	Where is the original policy that
02:+3:55 1		22,4655 10	was effective May 11, '03?
62.43:58 1	-	C2:4503 11	A. At corporate office.
024355 1	At Anna Meric Glos and an Griece da Di	02-45:10 12	Q. So, there's another version of this
02.44:00 1		02:48:17 13	Policy Manuai?
02×44:04 1 3	in a second field	02:4513 14	A. No. When a policy is put into
024ter 1	The same is the property of the same of th	024621 15	effect, it goes into this manual. When it is
cz:44:05 1)		02:4625 16	revised, the original is taken out and filed, and
02.46-12 1		025830 17	the revised document is then inserted into the
224414 15		224627 18 223843 19	manual so that it is kept up to date but it
02:14:17 20		DEAS 4 20	doesn't get tremendously bulky because you've got 14 old things in there.
0254619 2 1		DZ46H9 21	_
024422 22		02:45:52 22	The state of the s
02:14:25 23		023452 22	Issued after November, 2004, or is this the most recent one?
023425 24	 Q. And in terms of the 2003 Procedure 	02:46S7 24	A. I don't recall. I'd have to look.
92:14:29 25		02×17±00 25	MS. BERG: Okay. I'm going
	COMPU-TRAN SHORTHAND REPORTING		·
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024439 2 024439 4 024439 5 024439 6 024439 7 02469 8 02469 10 02460 11 02460 11 02460 12 02460 14 02460 14 02460 14 02460 17	Kevin Duffy policies continue to remain in effect after Exhibit 30 was Implemented in November of '04? A. Well, you're confusing "Procedure Manual" and "Policy Manual." Policy Manual is a general statement of what is done, and the Procedure Manual is a specific statement of how its done. Q. So, in other words, the procedures in Exhibit 28 did remain in effect continuing up to and after the November, 2004, Policy Manual came out? A. If I understand your question, yes. Q. Do you have confusion about it? Let me ask you this directly: Exhibit 28, did it ever, at any point in time, become rescinded or revoked? A. No. Q. And the 2003 procedures, then, were	02-47:01 2 02:47:02 4 72:47:03 5 02:47:03 6 02:47:03 6 02:47:03 9 07:47:03 10 02:47:03 11 02:47:03 12 02:47:03 15 02:47:03 16 02:47:03 17 02:47:03 17 02:47:03 17	Kevin Duffy to call for the production of any other Policy Manuals. MR. COON: We'll take it under advisement. DOCUMENT/DATA REQUESTED: Q. Going back to Bates stamped 388, the first paragraph: "Health care personnel are required to notify correctional personnel regarding an inmate's significant health needs that may affect classification decisions involving the inmate's housing assignment," et cetera. Do you see that? A. Yes. Q. "Correctional personnel should consult with medical personnel before making any movements or decisions involving inmates with special needs."
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Case 7-107-CV-02866-CS-GAY Document 29-22 — Filled 05/07/2008 — Page 10 f 35 133 135 1 Kevin Datify Q. One of them being, "Number 6:	Γ	Case 7:07-cv-02866-CS-GAY Documer	11,23-22	Filed 05/07/2008 Page 8 of 35
A. Yes. 2 Q. One of them being, "Number 6: 2 Mentally 18 or solidal." 3 Mentally 18 or solidal." 4 A. Yes. 2 Q. Are you aware of whether or not hose of success of success of notified any corrections personnel at any time success of notified any corrections personnel with respect success to a supplier of Species Shiotov about any of those success to success the success of succes		155	11/20-22	100
Mentally it or solidal." 4 A. Yes. 5 G. Do you know it, in the case of 9 Spencer Sinkov, health-care personnel at any time 18 Septicer Sinkov, health-care personnel at any time 18 to anything pertaining to Spencer Sinkov? 9 Sever 9 A. Not that I'm aware of. 9 Senan 10 Q. Are you aware of whether any 18 sans 12 staff or other Americor employees before making 18 sans 13 any decisions about Spencer, including his 18 sans 14 A. Not that I'm aware of. 18 Senan 15 A. Not that I'm aware of. 18 Senan 16 A. Not that I'm aware of. 18 Senan 17 Stamped 421 to 422, "Racciving Screening." 18 Senan 18 Q. That was effective on Nay 11th, 103. 18 Senan 29 A. Wester there actually any revisions to 18 Senan 29 Q. Were there actually any revisions to 18 Senan 29 Q. Were there actually any revisions to 18 Senan 29 Q. O Key. Ut say in the third 19 Senan 29 Q. O Cay. It say in th	į	TOTH DELL.	'	. <u> </u>
4 A. Yes. 5 Specicor Sinkov, health-care personnel at any time xen 17 notified any corrections personnel with respect xen 18 or Not that I'm aware of. xen 19 C. Take a look, if you woold, at Bates xen 19 C. Take a look, if you woold, at Bates xen 19 C. Take a look, if you woold, at Bates xen 19 C. Take a look, if you woold, at Bates xen 19 C. Take a look, if you woold, at Bates xen 19 C. Take a look, if you woold, at Bates xen 19 C. Take a look, if you woold, at Bates xen 20 Reviewed or reviewed on Naversher 15th, '04; xen 21 X tamed 421 to 422, 'Racelving Screening,' xen 22 A. Yes. xen 23 C. Okay. It says in the third xen 2 I X tamed 42 to 422 that, or was t just reviewed, if you know? xen 24 A. Yes. xen 25 C. A. Correct. xen 26 S. Schings. xen 27 C. Did you ever ask anybody, as part of xen 17 C. To dy you were ask anybody, as part of xen 18 then you roloking into Spencer's death, whether or not xen 19 C. That was effective on file xen 19 C. That was effective on May 11th, '03. xen 20 Reviewed or reviewed on November 15th, '04; xen 21 C. Ore of them is 'repetation,' 'nee of them is 'repetation,' 'nee of them is 'reabling.'' xen 21 A. Yes. xen 22 C. Do you know if anybody from AmeriCor xen 25 A. Yes. xen 26 C. MOPU-TRAN SHORTHAND REPORTING 154 154 155 155 156 156 156 156			©±023 2	 Q. Are you aware of whether or not
### 5 Q. Do you know if, in the case of severe 6 Specier Sinkov, health-care personned strany three cases 6 Specier Sinkov, health-care personned strany three cases 6 to anything pertaining to Specier Sinkov? ### 1 A. Not that I'm aware of, ### 2 A. Not that I'm aware of, ### 3 any decisions about Specier, including his ### 3 A. Not that I'm aware of. ### 4 A. Not that I'm aware of. ### 4 A. Not that I'm aware of. ### 5 A. Not that I'm aware of. ### 4 A. Not that I'm aware of. ### 5 A. Not that I'm aware of. ### 6 A. Not that I'm aware of. ###			025925	
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See	"	- 30 Jou (210) II, III GIE COSE OI		
sease 8 to anything pertaining to Spencer Sinkov? A. Not that I'm aware of. G. Are you aware of whether any sease 10 g. Are you aware of whether any sease 11 any decisions about Spencer, including his sease 12 fact for other Americar employees before making sease 13 any decisions about Spencer, including his sease 14 housing? A. Not that I'm aware of. G. Take a look, if you woold, at Bates stamped 42 to 422, "Receiving Screening." Stamped 42 to 422, "Receiving Screening." Stamped 42 to 422, "Receiving Screening." Sease 20 Revised or reviewed on November 15th, '04; Sease 22 A. Yes. Sease 23 A. Yes. Sease 24 A. Yes. Sease 25 A. I don't recall whether there was a COMPU-TRAN SHORTHAND REPORTING 1 Revision or just a review. 1 Provision or just a review. 2 Provision or just a review. 2 Provision or just a review. 3 Q. Ordey. It says in the third 2 Provision or just a review. 3 Q. And is that the Receiving Screening 4 Provision or just a review. 4 Provision or just a review. 5 While include linquiry into: "And then it Bats 5 Will include inquiry into: "And then it Bats 5 Will include inquiry into: "And then it Bats 5 Will include inquiry into: "And then it Bats 5 What is done by the correction staff and/or the 5 Wass 17 Q. And is that the Receiving Screening 5 Wass 16 A. Yes. 5 Wass 17 Q. And the fourth paragraph fourth 5 Wass 18 Q. So, meaning on the medical intake 5 Wass 19 O. Thom one generally done by the 5 Wass 19 O. Thom one generally done by the 5 Wass 19 O. Thom one generally done by the 5 Wass 19 O. Thom one generally done by the 5 Wass 19 O. Thom one generally done by the 5 Wass 19 O. Thom one generally done by the 5 Wass 19 O. Thom one generally done by the 5 Wass 19 O. Thom one generally done by the 5 Wass 19 O. Thom one generally done by the 5 Wass 19 O. Thom one generally done by t		-	025>42-	· · · · · · · · · · · · · · · · · · ·
A. Not that Tm aware of. Q. Are you aware of whether any aware 11 correctional personnel consulted with nursing aware 12 staff or other Americor employees before making aware 13 housing? aware 15 A. Not that Tm aware of. Q. Take a look, if you would, at Bates aware 16 A. Wittens complied; A. Not that I'm aware of. Q. Take a look, if you would, at Bates aware 17 stamped 42 to 422, "Receiving Screening." A. Wittens complied; A. Yes. A. Yes. A. Yes. A. Yes. COMPLITAN SHORTHAND REPORTING The skind fugue in quiry into:" And then it lists Compact of the skind fugue in quiry into:" And then it lists A. Correct. A. A. Corre	1	•	02:50:33 7	
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cases 11 correctional personnel consulted with nursing aleas 12 staff or other Americor employees before making seeds 13 amount, or the frequency? asses 14 housing? A. Not that I'm aware of. C. Take a look, if you would, at Bates seeds 17 stamped 421 to 422, "Receiving Screening." A. (Witness compiles) C. Take a look, if you would, at Bates seeds 19 correct? A. (Witness compiles) C. Take a look, if you would, at Bates seeds 19 correct? A. (Witness compiles) C. Take a look, if you would, at Bates seeds 19 correct? Cases 12 correct? Cases 12 correct? Cases 22 do. Tak was effective on May 11th, '03. Cases 24 bits, or was it just reviewed, if you know? A. I don't recall whether there was a COMPU-TRAN SHORTHAND REPORTING Cases 24 bits, or was it just reviewed, if you know? A. I don't recall whether there was a COMPU-TRAN SHORTHAND REPORTING Cases 3 correct. Cases 3 correct. Cases 4 correct. Cases 5 correct of them is "breathing," and the flusth is "condition of the scient," them is "behavior," or of them is "breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and then it breathing," and the flusth is "condition of the scient," and the flusth is "condition of the			025045 9	-
Second 12 Staff or other Americor employees before making Staff or other Americor experience Staff or other experie	i.	,	225043 10	
Season 13 any decisions about Spencer, including his season 14 housing?				
### 14 housing? ### 15 A. Not that I'm aware of. Q. Take a look, if you would, at Bates ### 16 A. (Witness compiles) ### 16 A. (Witness compiles) ### 17 stamped 421 to 422, "Receiving Screening." ### 18 A. (Witness compiles) ### 19 A. (Witness compiles) ### 20 Acytised or reviewed on November 15th, '04; ### 21 A. Yes. ### 22 A. Yes. ### 23 A. Yes. ### 23 A. Yes. ### 24 A. I don't recall whether there was a COMPL-TRAN SHORTHAND REPORTING ### 1				
### 15 A. Not that I'm aware of. ### 20 C. Take a look, if you would, at Bates ### 30 C. Take a look, if you would, at Bates ### 41 A. (Witness compiles) ### 19 A. (Witness compiles) ### 19 A. (Witness compiles) ### 21 A. Yes. ### 22 A. Yes. ### 22 A. Yes. ### 22 A. Yes. ### 23 C. Ower there actually any revisions to this, or was it just reviewed, if you know? ### 24 I don't recall whether there was a COMPULTRAN SHORTHAND REPORTING ### 13 A. I don't recall whether there was a COMPULTRAN SHORTHAND REPORTING ### 14 A. To or each imminum, the Receiving Screening ### 25 A. Action or just a review. ### 26 Just things. ### 27 Pevision or just a review. ### 27 Pevision or just a review. ### 28 A. Correct. ### 28 A. Correct. ### 29 C. Do you know if anybody from Americor ### 20 COMPULTRAN SHORTHAND REPORTING ### 25 A. No. ### 26 Just things. ### 26 Just things. ### 27 Pevision or just a review. ### 28 Just things. ### 28 A. Correct. ### 28 Just things. ### 28 A. Correct. ### 29 C. Do you know if anybody from Americor ### 20 Do you know if anybody from Americor ### 21 A. No. ### 22 A. Yes. ### 22 A. Yes. ### 22 A. Yes. ### 23 Just in the initial series of the skin; ### 24 Just in the initial series of the skin; ### 25 Just in the initial series of the skin; ### 25 Just in the initial series of the skin; ### 25 Just in the initial series of the skin; ### 25 Just in the initial series of the skin; ### 25 Just in the initial series of the skin; ### 25 Just in the initial series of the skin; ### 26 Just in the initial series of the skin; ### 27 Just in the initial series of the skin; ### 28 Just in the initial series of the skin; ### 28 Just in the initial series of the skin; ### 28 Just in the initial series of the skin; ### 28 Just in the initial series of the skin; ### 28 Just in the initial series of the skin; ### 28 Just in the initial series of the skin; ### 28 Just in the initial series of the skin; ### 28 Just in the initial series of the skin; ### 28 Just in the init	[
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Second 20 Revised or reviewed on November 15th, '04; Second 21 Correct? Second 22 A. Yes. Second 23 Q. Were there actually any revisions to Care 24 this, or was it just reviewed, if you know? Second 24 this, or was it just reviewed, if you know? A. I don't recall whether there was a COMPU-TRAN SHORTHAND REPORTING 134 Revin Duffy 1 Kevin Duffy 1 Kevin Duffy 1 Revision or just a review. 2 Q. Civic Yes and the fourth is "condition of the skin," whether or not he, Spencer, had needle marks or other indications of drug abuse? COMPU-TRAN SHORTHAND REPORTING 134 Revin Duffy 1 Kevin Duffy 1 Kevin Duffy 1 Kevin Duffy 1 Kevin Duffy 2 Position or just a review. 3 Q. Civic Yes yield the third 2 paragraph, "At a minimum, the Receiving Screening will include inquiry into:" And then it lists 2 paragraph, "At a minimum, the Receiving Screening will include inquiry into:" And then it lists 2 paragraph and the fourth is "condition of the skin;" 2 correct? 2 A. Yes. 2 Q. Do you know if anybody from Americor 2 dever looked to see, with respect to condition of the skin, whether or not he, Spencer, had needle marks or other indications of drug abuse? 2 COMPU-TRAN SHORTHAND REPORTING 135 Kevin Duffy 1 Kevin Duffy 1 Kevin Duffy 1 Kevin Duffy 1 Kevin Duffy 2 A. No. 2 Did you ever see any documents which showed that that had been done? 3 Q. Did you ever see any documents which showed that that had been done? 4 A. No. 4 N			·	
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2. A. Yes. 2. Q. Were there actually any revisions to 2. Were there actually any revisions to 2. A. I don't recall whether there was a 2. COMPU-TRAN SHORTHAND REPORTING 1. Kevin Duffy 1. Kevin Duffy 1. Kevin Duffy 1. Computer Tank Shorthand Receiving Screening 2. The showed that that had been done? 2. The showed that that had been done? 3. Q. And is that the Receiving Screening 4. The one generally done by the 3. The nurses review the record within 3. The nurses review the record within 4. The nurses review the record within 4. The nurses review the record within 5. The nurs	1			
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COMPU-TRAN SHORTHAND REPORTING 134 135 136 137 138 139 139 130 130 131 131 132 132 133 135 136 137 138 138 138 138 138 138 138		and the man relater to the order in you known		
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1 Kevin Duffy 2 revision or just a review. 2 Q. Okay. It says in the third 2 paragraph, "At a minimum, the Receiving Screening 3 Q. Did you ever see any documents which 3 paragraph, "At a minimum, the Receiving Screening 4 will include Inquiry into:" And then it lists 5 A. Not that I recall. 5 six things. 5 A. Correct. 5 A. Not that I recall. 5 cases 6 Q. If a correction officer does the 5 screening and neglects to ask questions about 5 what is done by the correction staff and/or the 5 cases 10 AmeriCor staff together? 5 cases 11 A. The one generally done by the 5 correctional staff is reviewed by the nursing 5 staff, yes. 6 Q. So, meaning on the medical intake 5 correctional staff is reviewed by the nursing 5 staff, yes. 6 Q. So, meaning on the medical intake 6 Q. So, meaning on the medical intake 6 Cases 17 Q. And the fourth paragraph — fourth 6 cases 17 Q. And the fourth paragraph — fourth 6 cases 18 provided, then they have the ability to go see 6 the nurse and do an eyeball, or physical 6 cases 19 be made into use of alcohol and other drugs, 6 and a history of problems which may have 6 cases 21 po you see that? 6 cases 22 po you see that? 7 Q. One-on-one with the inmate, you mean? 7 A. Correct. 7 A. Not that I recall. 8 showed that that had been done? 8 showed that that h			1	
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5 will include Inquiry into: "And then it lists of six things. 5 six things. 6 six things. 7 A. Correct. 9 A. Correct. 9 that is done by the correction staff and/or the states of that is done by the correction staff and/or the states of the states o	a2.49:17 2	134 Kevin Duffy revision or just a review.	0251:19 2	136 <i>Kevin Duffy</i> A. No.
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occurred after ceasing use; e.g., convulsions." occurred after ceasing use; e.g., con	22.49:17 2 02.48:51 4 02.49:24 5 02.49:24 6 02.49:30 7 02.49:32 10 02.49:32 11 02.49:42 11 02.49:43 15 02.49:43 15 02.49:43 15 02.49:43 17 02.49:43 17 02.49:43 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:57 18 02.50:05 20	Kevin Duffy revision or just a review. Q. Okay. It says in the third paragraph, "At a minimum, the Receiving Screening will include Inquiry into:" And then it lists six things. A. Correct. Q. And is that the Receiving Screening that is done by the correction staff and/or the AmeriCor staff together? A. The one generally done by the correctional staff is reviewed by the nursing staff, yes. Q. So, meaning on the medical intake form, Itself? A. Yes. Q. And the fourth paragraph — fourth numbered paragraph, specifies, "Inquiries should be made into use of alcohol and other drugs, Including types of drugs used, mode of use,	025119 2 025119 3 025121 4 025122 5 025122 6 025123 7 025134 8 02513 11 025202 12 025204 13 025204 13 025211 15 025211 15 025211 16 021218 17 025221 18 025222 19	Kevin Duffy A. No. Q. Did you ever see any documents which showed that that had been done? A. Not that I recall. Q. If a correction officer does the screening and neglects to ask questions about what's required by AmeriCor's policies here, are AmeriCor staff required, as part of their review of those forms, to follow up with the inmate? A. The nurses review the record within four hours that we talked about. And if they have questions about information that is provided, then they have the ability to go see the nurse and do an eyeball, or physical evaluation/assessment, whatever. Q. One-on-one with the inmate, you mean? A. Yes. Q. And do you know if in this case,
62/50/22 24 Do you see that? 62/50/22 24 intake form? 62/50/22 25 A. Yes. 62/50/22 25 A. One of the documents that you showed	22.49:17 2 02.48:21 4 02.49:24 5 02.49:24 6 02.49:24 8 02.49:24 10 02.49:42 11 02.49:42 11 02.49:42 14 02.49:43 15 02.49:43 15 02.49:53 16 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17	Kevin Duffy revision or just a review. Q. Okay. It says in the third paragraph, "At a minimum, the Receiving Screening will include Inquiry into:" And then it lists six things. A. Correct. Q. And is that the Receiving Screening that is done by the correction staff and/or the AmeriCor staff together? A. The one generally done by the correctional staff is reviewed by the nursing staff, yes. Q. So, meaning on the medical intake form, Itself? A. Yes. Q. And the fourth paragraph — fourth numbered paragraph, specifies, "Inquiries should be made into use of alcohol and other drugs, Including types of drugs used, mode of use, amount used, frequency used, date or time of last	025119 2 925119 3 025121 4 925122 5 925123 6 925123 7 925134 8 925135 9 925135 11 925202 12 925204 13 925204 13 925211 15 925217 16 921218 17 925221 18 925221 18 925222 19 925222 19	Kevin Duffy A. No. Q. Did you ever see any documents which showed that that had been done? A. Not that I recall. Q. If a correction officer does the screening and neglects to ask questions about what's required by AmeriCor's policies here, are AmeriCor staff required, as part of their review of those forms, to follow up with the inmate? A. The nurses review the record within four hours that we talked about. And if they have questions about information that is provided, then they have the ability to go see the nurse and do an eyeball, or physical evaluation/assessment, whatever. Q. One-on-one with the inmate, you mean? A. Yes. Q. And do you know if in this case, if, upon reviewing any of the medical intake
02.50:22 25 A. Yes. DESS241 25 A. One of the documents that you showed	22.49:17 2 02.48:9 3 62.45:21 4 02.49:24 5 02.49:24 8 02.49:24 8 02.49:24 11 02.49:42 11 02.49:42 11 02.49:42 12 02.49:42 13 02.49:42 14 02.49:43 15 02.49:43 15 02.49:53 16 02.49:53 16 02.49:53 17 02.49:57 18 02.49:57 18 02.49:57 18 02.49:57 20 02.50:05 20 02.50:05 21 1 22	Kevin Duffy revision or just a review. Q. Okay. It says in the third paragraph, "At a minimum, the Receiving Screening will include Inquiry into:" And then it lists six things. A. Correct. Q. And is that the Receiving Screening that is done by the correction staff and/or the AmeriCor staff together? A. The one generally done by the correctional staff is reviewed by the nursing staff, yes. Q. So, meaning on the medical intake form, Itself? A. Yes. Q. And the fourth paragraph — fourth numbered paragraph, specifies, "Inquiries should be made into use of alcohol and other drugs, Including types of drugs used, mode of use, amount used, frequency used, date or time of last use, and a history of problems which may have	025009 2 025009 3 025009 6 025029 6 025029 7 025034 8 025035 9 025030 10 025051 11 025202 12 025201 15 025201 15 025201 16 020201 16 020201 17 025201 18 020202 19 020202 19 020202 20	Kevin Duffy A. No. Q. Did you ever see any documents which showed that that had been done? A. Not that I recall. Q. If a correction officer does the screening and neglects to ask questions about what's required by AmeriCor's policies here, are AmeriCor staff required, as part of their review of those forms, to follow up with the inmate? A. The nurses review the record within four hours that we talked about. And if they have questions about information that is provided, then they have the ability to go see the nurse and do an eyeball, or physical evaluation/assessment, whatever. Q. One-on-one with the inmate, you mean? A. Yes. Q. And do you know if in this case, if, upon reviewing any of the medical intake forms, anybody from AmeriCor went and did an
A. One of the documents that you showed	22.49:17 2 02.49:24 4 02.49:24 5 02.49:24 6 02.49:25 7 02.49:22 10 02.49:22 11 122.49:42 12 02.49:42 13 02.49:42 13 02.49:43 15 02.49:43 15 02.49:53 16 02.49:53 17 02.49:53 17 02.49:57 18 12.50:02 19 02.50:05 20 02.50:05 21 4 22 02.50:05 21 4 22	Kevin Duffy revision or just a review. Q. Okay. It says in the third paragraph, "At a minimum, the Receiving Screening will include Inquiry into:" And then it lists six things. A. Correct. Q. And is that the Receiving Screening that is done by the correction staff and/or the AmeriCor staff together? A. The one generally done by the correctional staff is reviewed by the nursing staff, yes. Q. So, meaning on the medical intake form, Itself? A. Yes. Q. And the fourth paragraph — fourth numbered paragraph, specifies, "Inquiries should be made into use of alcohol and other drugs, Including types of drugs used, mode of use, amount used, frequency used, date or time of last use, and a history of problems which may have occurred after ceasing use; e.g., convulsions."	025019 2 925019 4 925020 5 925120 7 925134 8 925035 9 925130 10 925130 11 925202 12 925204 13 925204 13 925204 15 920211 15 920211 15 920211 15 920211 15 920221 18 920221 18 920222 19 920222 20 92022 21 92022 21	Kevin Duffy A. No. Q. Did you ever see any documents which showed that that had been done? A. Not that I recall. Q. If a correction officer does the screening and neglects to ask questions about what's required by AmeriCor's policies here, are AmeriCor staff required, as part of their review of those forms, to follow up with the inmate? A. The nurses review the record within four hours that we talked about. And if they have questions about information that is provided, then they have the ability to go see the nurse and do an eyeball, or physical evaluation/assessment, whatever. Q. One-on-one with the inmate, you mean? A. Yes. Q. And do you know if in this case, if, upon reviewing any of the medical intake forms, anybody from AmeriCor went and did an eyeball of Spencer to see what information they
COMPU-TRAN SHOR THAND REPORTING COMPU-TRAN SHORTHAND REPORTING	22.49:17 2 02.48:91 4 02.49:24 5 02.49:24 6 02.49:24 8 02.49:24 10 02.49:42 11 02.49:42 11 02.49:44 12 02.49:45 14 02.49:45 15 02.49:53 16 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 20 02.50:22 21 4 22 02.49:37 23 02.50:22 24	Kevin Duffy revision or just a review. Q. Okey. It says in the third paragraph, "At a minimum, the Receiving Screening will include Inquiry into:" And then it lists six things. A. Correct. Q. And is that the Receiving Screening that is done by the correction staff and/or the AmeriCor staff together? A. The one generally done by the correctional staff is reviewed by the nursing staff, yes. Q. So, meaning on the medical intake form, Itself? A. Yes. Q. And the fourth paragraph — fourth numbered paragraph, specifies, "Inquiries should be made into use of alcohol and other drugs, Including types of drugs used, mode of use, amount used, frequency used, date or time of last use, and a history of problems which may have occurred after ceasing use; e.g., convulsions." Do you see that?	025119 2 025119 3 025119 4 075122 5 025120 6 025120 7 025134 8 025135 9 025134 11 025202 12 025203 13 025203 14 025211 15 125217 16 021223 17 025221 18 020222 19 025223 20 025224 20 025224 21 025224 22 025224 23 025224 23	Kevin Duffy A. No. Q. Did you ever see any documents which showed that that had been done? A. Not that I recall. Q. If a correction officer does the screening and neglects to ask questions about what's required by AmeriCor's policies here, are AmeriCor staff required, as part of their review of those forms, to follow up with the inmate? A. The nurses review the record within four hours that we talked about. And if they have questions about information that is provided, then they have the ability to go see the nurse and do an eyeball, or physical evaluation/assessment, whatever. Q. One-on-one with the inmate, you mean? A. Yes. Q. And do you know if — in this case, if, upon reviewing any of the medical intake forms, anybody from AmeriCor went and did an eyeball of Spencer to see what information they could get that was not included in the medical intake form?
	22.49:17 2 02.48:91 4 02.49:24 5 02.49:24 6 02.49:24 8 02.49:24 10 02.49:42 11 02.49:42 11 02.49:44 12 02.49:45 14 02.49:45 15 02.49:53 16 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 17 02.49:53 20 02.50:22 21 4 22 02.49:37 23 02.50:22 24	Kevin Duffy revision or just a review. Q. Okay. It says in the third paragraph, "At a minimum, the Receiving Screening will include Inquiry into:" And then it lists six things. A. Correct. Q. And is that the Receiving Screening that is done by the correction staff and/or the AmeriCor staff together? A. The one generally done by the correctional staff is reviewed by the nursing staff, yes. Q. So, meaning on the medical intake form, Itself? A. Yes. Q. And the fourth paragraph — fourth numbered paragraph, specifies, "Inquiries should be made into use of alcohol and other drugs, Including types of drugs used, mode of use, amount used, frequency used, date or time of last use, and a history of problems which may have occurred after ceasing use; e.g., convulsions." Do you see that? A. Yes.	025119 2 025119 3 025119 4 075122 5 025120 6 025120 7 025134 8 025135 9 025134 11 025202 12 025203 13 025203 14 025211 15 125217 16 021223 17 025221 18 020222 19 025223 20 025224 20 025224 21 025224 22 025224 23 025224 23	Kevin Duffy A. No. Q. Did you ever see any documents which showed that that had been done? A. Not that I recall. Q. If a correction officer does the screening and neglects to ask questions about what's required by AmeriCor's policies here, are AmeriCor staff required, as part of their review of those forms, to follow up with the inmate? A. The nurses review the record within four hours that we talked about. And if they have questions about information that is provided, then they have the ability to go see the nurse and do an eyeball, or physical evaluation/assessment, whatever. Q. One-on-one with the inmate, you mean? A. Yes. Q. And do you know if — in this case, if, upon reviewing any of the medical intake forms, anybody from AmeriCor went and did an eyeball of Spencer to see what information they could get that was not included in the medical intake form? A. One of the documents that you showed

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	137		.arr 139
	1 Kevin Dut.	1	Kevin Duffy
30,53;43	The state of the s	02:00:53 2	, p,,
	he he talks about the inmate not having	02.5458 3	
745 4	the state of the second state of the second state of the second s	22:50:52 4	was a problem.
	The second secon	02:5500 5	 Well, the nurse did note use of
or;50.54 f		025500 6	heroin; correct?
02≌2:55 7	Q. There's no indication, though, of	0755608 7	A. Yeah.
02.52:57	anything about the condition of the skin;	12:56:05 8	Q. And in terms of use of other drugs
m2 sp2 = 9	correct?	02:55:10 B	here, this policy Bates stamped 422, requires
62:53 00 10	A. Not as I recall, no.	#255:id 10	inquiry at screening into other things, such as
52:53:02 11	1 mirriadaly meralang	925518 11	the mode of use, the amount used, the frequency
025395 12	Clarke, ever followed up with Spencer to examine	78:3021 12	used, and a history of problems which may have
025368 13	his skin to see anything about, you know, track	623323 13	occurred after ceasing use.
02:53:12 14	marks?	msse 14	A. Right.
62:53:13 15	A. No.	026926 15	 Q. And there's zero indication in any
62:55:15 16	Q. How about in terms of the drug use?	10:55:28 16	of these records which indicates that those type
02:63:17 17	There was a note in the medical intake that he	920502 17	of questions or that information was ever
62:52:10 18	had used heroin 24 hours ago, but there was no	ozasa 18	soficited. So, my question is
00:13:20 19	indication as to the mode of use, the amount	ozsan 19	A. But there's also none that indicates
225325 20	used, the frequency used, the history of problems	æ,sé:10 20	that it wasn't done.
0263:28 21	which may have occurred after ceasing use.	ep:55:40 21	Q. So, do you have any information, as
02:50:33 22	Do you know if Clarke ever followed	c255 et 22	you sit here today, that it was, in fact, done?
62:59:34 23	up on any of those areas that were not included	00:55:e4 23	A. I don't have any information one way
02:33:26 24	as part of the correction officer's screening?	02:55:46 24	or the other.
0253341 25	MR. COON: Object to the	02:55:47 25	Q. Assuming it wasn't done, under those
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	138		140
1	138 Kevin Duffy	1	140 Kevin Duffy
1 0253 42 2	•	1	·
1 0253.42 2 0253.43 3	Kevin Duffy	1 .2::5::0 2 .02:5:5:2 3	Kevin Duffy circumstances, is an AmeriCor employee required
_	Kevin Duffy form.		Kevin Duffy
0253.43 3	Kevin Duffy form. You can answer it.	02.6552 3	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of
02:53:43 3	Kevin Duffy form. You can answer it. A. No.	025555 4	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry?
0253.43 3 02531:45 4 02:53:46 5	Kevin Duffy form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor	025952 3 025955 4 025959 5	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the
0253.43 3 0253165 4 02:53165 5 02:5349 6	Kevin Duffy form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that?	025555 4 025555 5 025556 5	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form.
0253.43 3 0253165 4 0253166 5 0253249 6 0253250 7	Kevin Duffy form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that? A. No.	025552 3 025555 4 025555 5 025657 6 025657 7	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection.
0253.43 3 0253:65 4 02:53:65 5 02:53:49 6 02:53:50 7 02:53:50 8	Form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that? A. No. Q. So, in those circumstances where	025555 4 025555 5 025556 5 025557 6 025557 6	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection. MR. COON: You can answer It.
0253.43 3 0253.43 4 0253.46 5 0253.49 6 0253.50 7 0253.50 8 0253.51 9	Form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that? A. No. Q. So, in those circumstances where information was not included in the correction	025562 3 025555 4 025559 5 025657 6 025657 7 025659 8	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection. MR. COON: You can answer It.
0253.43 3 0253.43 4 0253.45 5 0253.49 5 0253.50 7 0253.50 9 0253.54 10	form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that? A. No. Q. So, in those circumstances where information was not included in the correction officer's screening but which was required by	02:55:2 3 02:55:5 4 02:55:5 5 02:55:5 6 02:55:5 7 02:55:5 8 02:56:0 10	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection. MR. COON: You can answer It. A. Okay. I'm sorry. Would you restate
0253.43 3 0253.43 4 0253.45 5 0253.40 6 0253.50 7 0253.50 8 0253.51 9 0253.54 10 0253.57 11	form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that? A. No. Q. So, in those circumstances where information was not included in the correction officer's screening but which was required by AmeriCor's policy, would Clarke or another nurse	02:55:52 3 02:55:55 4 02:55:59 5 02:56:57 6 02:56:57 6 02:56:57 7 02:56:59 8 02:56:01 9 02:56:05 10	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection. MR. COON: You can answer It. A. Okay. I'm sorry. Would you restate or rephrase the question?
0253.43 3 0253.43 4 0253.45 5 0253.50 7 0253.50 7 0253.51 8 0253.51 9 0253.54 10 0253.57 11 0253.50 12	form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that? A. No. Q. So, in those circumstances where information was not included in the correction officer's screening but which was required by AmeriCor's policy, would Clarke or enother nurse be required to actually follow up to get the	02:55:2 3 02:55:5 4 02:55:5 5 02:55:5 6 02:55:5 6 02:55:5 8 02:56:0 9 02:56:0 10 02:56:0 11 02:50:0 12	Kevin Duffy circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection. MR. COON: You can answer It. A. Okay. I'm sorry. Would you restate or rephrase the question? Q. Sure. Let's assume, on the medical
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0253.43 3 0253.43 4 0253.43 5 0253.43 6 0253.53 7 0253.53 8 0253.53 9 0253.54 10 0253.53 11 0253.53 12 0253.53 15 0253.53 15 0253.53 15 0253.53 16 0253.53 16 0253.53 17 0253.53 18 0253.53 19 0253.53 20 0253.53 21	form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that? A. No. Q. So, in those circumstances where information was not included in the correction officer's screening but which was required by AmeriCor's policy, would Clarke or enother nurse be required to actually follow up to get the information that was missing? MR. COON: Objection to the form. You can answer. A. If the nurse felt the need to follow up, then the nurse would be expected to do that and to document. Q. What if the nurse, when conducting their review of the forms within four hours,	02:55:2 3 02:55:5 4 02:55:5 5 02:55:5 6 02:55:5 8 02:56:0 9 02:56:0 10 02:56:0 11 02:56:0 11 02:56:0 13 02:56:0 13 02:56:0 15 02:56:0 15 02:56:0 15 02:56:0 15 02:56:0 15	Circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection. MR. COON: You can answer it. A. Okay. I'm sorry. Would you restate or rephrase the question? Q. Sure. Let's assume, on the medical intake form, that AmeriCor staff reviews it within the four hours. A. Okay. Q. And signs off and initials, as Peter Clarke did here. Okay? A. Yes. Q. And with respect to that medical intake form, let's assume the entire area on tuberculosis was blank. A. Okay.
0253.43 3 0253.43 4 0253.45 5 0253.45 7 0253.55 9 0253.55 10 0253.55 10 0253.55 12 0253.55 12 0253.55 14 0254.10 15 0254.15 16 0254.15 16 0254.15 17 0254.25 18 0254.25 19 0254.25 19 0254.25 20 0254.25 21 4 22	form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that? A. No. Q. So, in those circumstances where information was not included in the correction officer's screening but which was required by AmeriCor's policy, would Clarke or another nurse be required to actually follow up to get the information that was missing? MR. COON: Objection to the form. You can answer. A. If the nurse felt the need to follow up, then the nurse would be expected to do that and to document. Q. What if the nurse, when conducting their review of the forms within four hours, noted that information was not contained on the form that's required by this policy? Are they	02:55:2 3 02:55:5 4 02:55:5 5 02:55:5 6 02:55:5 8 02:55:0 10 02:56:0 10 02:56:0 11 02:56:0 12 02:56:0 15 02:56	Circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection. MR. COON: You can answer lt. A. Okay. I'm sorry. Would you restate or rephrase the question? Q. Sure. Let's assume, on the medical intake form, that AmeriCor staff reviews it within the four hours. A. Okay. Q. And signs off and initials, as Peter Clarke did here. Okay? A. Yes. Q. And with respect to that medical intake form, let's assume the entire area on tuberculosis was blank. A. Okay. Q. Would the AmeriCor staff person,
0253.43 3 0253.43 4 0253.45 5 0255.50 7 0255.50 8 0255.51 9 0255.52 10 0255.52 11 0255.02 12 0255.02 13 0255.03 14 0255.03 15 0255.03 15 0255.03 17 0255.03 18 0256.03 19 0256.03 20 0256.03 21 • 22 0256.03 21 • 22	form. You can answer it. A. No. Q. Do you know if anybody from AmeriCor followed up on that? A. No. Q. So, in those circumstances where information was not included in the correction officer's screening but which was required by AmeriCor's policy, would Clarke or enother nurse be required to actually follow up to get the information that was missing? MR. COON: Objection to the form. You can answer. A. If the nurse felt the need to follow up, then the nurse would be expected to do that and to document. Q. What if the nurse, when conducting their review of the forms within four hours, noted that information was not contained on the	02:55:2 3 02:55:5 4 02:55:5 5 02:55:5 5 02:55:5 7 02:55:5 10 02:55:0 10 02:56:0 11 02:56:0 11 02:56:0 11 02:56:0 12 02:56:0 15 02:56	Circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection. MR. COON: You can answer lt. A. Okay. I'm sorry. Would you restate or rephrase the question? Q. Sure. Let's assume, on the medical intake form, that AmeriCor staff reviews it within the four hours. A. Okay. Q. And signs off and initials, as Peter Clarke did here. Okay? A. Yes. Q. And with respect to that medical intake form, let's assume the entire area on tuberculosis was blank. A. Okay. Q. Would the AmeriCor staff person, upon reviewing that form, be required to do
0253.43 3 0253.43 4 0253.43 5 0253.43 6 0253.43 7 0253.53 8 0253.53 10 0253.54 10 0253.54 10 0253.55 11 0253.55 15 0253.55 15 0253.55 16 0253.55 16 0253.55 16 0253.55 17 0253.25 18 0253.25 18 0253.25 18 0253.25 20 0253.25 21 1 22 0253.25 23	Form. You can answer it. A. No. Q. Do you know if anybody from Americor followed up on that? A. No. Q. So, in those circumstances where information was not included in the correction officer's screening but which was required by Americor's policy, would Clarke or another nurse be required to actually follow up to get the information that was missing? MR. COON: Objection to the form. You can answer. A. If the nurse felt the need to follow up, then the nurse would be expected to do that and to document. Q. What if the nurse, when conducting their review of the forms within four hours, noted that information was not contained on the form that's required by this policy? Are they required to do anything at that point?	02:55:2 3 02:55:5 4 02:55:5 5 02:55:5 6 02:55:5 7 02:55:5 10 02:56:0 10 02:56:0 11 02:56:0 11 02:56:0 12 02:56:0 13 02:56:0 14 02:56:0 15 02:56:1 16 02:56:1 16 02:56:1 18	Circumstances, is an AmeriCor employee required to follow up to get the answers to those areas of inquiry? MR. COON: Objection to the form. MR. KLEINBERG: Objection. MR. COON: You can answer lt. A. Okay. I'm sorry. Would you restate or rephrase the question? Q. Sure. Let's assume, on the medical intake form, that AmeriCor staff reviews it within the four hours. A. Okay. Q. And signs off and initials, as Peter Clarke did here. Okay? A. Yes. Q. And with respect to that medical intake form, let's assume the entire area on tuberculosis was blank. A. Okay. Q. Would the AmeriCor staff person,

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ļ	141	1	
	1 Kevin Dui.,		1 Kevin Duffy
02:50:3	- 70 160	62:5ap5	2 person be required to follow up after reviewing
02:58:38		025537	3 that form and realizing that section was blank?
48	. we are cost of the LD intollisation,	52:58:44	4 A. For that specific example, no.
^a	5 they would be required to follow up with the	02-56-50	5 Q. Why not?
)	6 Inmate to determine the inmate's states because	02:55;57	6 A. Because if an inmate's on
	7 at some point, the inmate would get tested for 8 TB, and we'd need to know whether they had been	02:58:55	7 medication, he or she is gonna tell you that when
	and the state of t	025858	8 they come in there.
· · · · · ·	- The state of the	02:5a:50	9 Q. You're assuming that.
92:36:56 1	- Nous response med as Suit of	C25909 1	What if it's not indicated on the
025568 1		0250.63	11 form, and there's no record that it was ever
025700 1 .	Carrette	52:50:65 1	2 asked?
02:37:02 1	meetions, meetions	0259.06 1	3 A. That inmate's gonna let you know
025709 14		02:58:12 1	4 that he or she is on medication.
02:57:10 15	wood the harding skill be reduced	\$2588:F4 1	5 Q. You're sure of that?
02.47.11 11	and the same of the same same same same same same same sam	025£15 1	 A. One way or the other.
02.57.17 17	ar it marcated that, for mistance,	æ;≤s;16 1	7 Q. You're sure of that?
7 02:57:20 1	and the desire of the disease, yes, they the	c25917 1	8 A. Yes.
02:57:24 15	Total and the state of the stat	0252.17	9 Q. Have you ever performed bookings of
JE:57:25 20	The second crace was recoming	52:50:20 2	_
GZ:57:27 21	of the built of the tray of the built.	022923 2	
020700 22	and the state of the state of	02:03:26 2	2 A. Yes.
ಂದಾಗವ 23	during the physical assessment.	02:59:27 2	 Q. And how much experience have you had
pz+795 24	Q. And that would be, then, within	025929 24	·
azsmar 25	14 days?	0≥56:34 2 5	5 A. It's been a while since I did it
	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
F	142	1	144
1	Kevin Duffy	1	Kevin Duffy
02:57:37 2	A. Yes.	C259.07 2	personally, but I spent several years doing it.
9257:36 3	Q. Not before?	025839 3	-
C2:57:41 4	 A. Not necessarily not before. Again, 	#2:58:42 4	. ·
02=140 5	it depends. I mean, you have to keep in mind the	025944 5	
225747 6	inmates have 24-hour-a-day/seven-day-a-week	осняя б	
92:57.51 7	access to health care. All they have to do is	525957 7	A. In some cases. Not where it
02:57:53 8	ask, and the officer will either report it	0342500 8	involves drugs.
92 57 55 9	through, or the inmate fills out the form, drops	03:00.en 9	Q. Take a look, if you would, at
62:57:56 10	it into the box. Those are picked up every	castoo4 10	
_ co-seçz 11	night. So, there are multiple ways for this	030000 11	
2258.07 12	information to get to medical. That's the way	01:50:55 12	A. Okay.
02::9::a 13	the system is designed.	63,0214- 13	Q. The second page.
2755.09 14	Q. Do you know if that's the way the	0300:17 14	A. (Witness compiles)
oe:51:11 15	system actually functions?	20:20:20 15	Q. Number 25: "Illegal drug use" is
92:88:13 16	A. Yes, it does.	00:00:23 16	checked, "Yes." And then in terms of the
ರಾನ≋₁₊ 17	Q. You're sure of that?	03:00:26 17	comments all it says is, "24 hours, heroin."
02:53:15 18	A. Yes, I am.	20:20:29 18	Do you see that?
uz de:16 19	Q. With respect to this policy,	9300000 19	A. Yes,
∞:sk:19 20	"Receiving screening at minimum will include	03:00:30 20	Q. Do you know if that means that he
02:55:25 21		10:20:23 21	used it for 24 hours? Twenty-four hours ego?
; 22	requirements, including dietary requirements."	42.0236 22	Twenty-four hours was the first time? Any !dea?
02 5825 23	This is at page 421,	m::00:39 23	A. That means his last use of heroin
02.55;29 24		1000vz 2 4	was 24 hours prior to this.
02.5abz 25	_	3:00::4 25	Q. And there's no indication on this as
	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING

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	145	ļ	. 147
	1 Kevin Duh	· ·	l Kevin Duffy
,	2 to the amount of heroin used; correct?	03.02%8 2	· · · · · · · · · · · · · · · · · · ·
03:07:65	A. Correct.	00:52:51	the Receiving Screening?
1 48 4	Q Or the frequency?	03x254 4	A. Not that I recall.
1 2 3	A. Correct.	03.02:56	Q. Did you ever provide anyone at the
) 02:02.52 8	Q. And there's no indication as to the	03:02:57 6	to the seaso, the that only destry but t
00:00:00	made of use?	03:58.01 7	mean, corrections county employees, you know, at
рэжоат 8	-	осюжов 8	, i in an
. 00:0055 &	Q. Above that, Number 24 23, excuse	33:03:10 9	
60:01:94 10		03:20:1 10	,,
0301:00 11 2001:09 12	· · · · · · · · · · · · · · · · · · ·	0355613 11	· •
93:91:10 13		03.02:14 12	
056::10 14	_	a:m:14 13	
03.01.72 15		e350:14	
23.0 tile 15	the state of the s	03.0311 15	
03:01:17 17	· · · ·g · ·	03:03:19 16	and the state of t
020107 18	1 1	00:08:21 17	
2 mart 19	_	000025 18	at a Receiving Screening?
3300 ZO		03.03/23 19	A. Not that I recall.
03.01.27. 21	went through detox six months earlier in terms of	m:m:2a 20	Q. So, in the case where a correction
050128 22	withdrawal symptoms; correct?	xo:xxxx 21	officer does the Receiving Screening, this whole
(0):01:29 23	A. Correct.	03:05:25 22 02:03:40 23	section, 421 to 422, would have no applicability.
ca.co.co 24		maxii 24	Is that what you're saying?
65 61 21 25	anybody asked him anything about whether he had	00;m;15 25	A. I don't know that I would phrase it
	COMPU-TRAN SHORTHAND REPORTING	00:00:45 2.5	COMPUTEMA SUCCESSAD SERVICE
	146		COMPU-TRAN SHORTHAND REPORTING
	146 Kevîn Duffy	1	148
1 050133 2	Kevin Duffy	1 20:20:43 2	148 Kevin Duffy
1 05:01:35 2 05:01:35 3		-	148 <i>Kevin Duffy</i> Q. Well, how would you phrase it?
	Kevin Duffy any problems that occurred after he stopped using	20:20:43	148 Kevin Duffy
Δυψ1,35 3	Kevin Duffy any problems that occurred after he stopped using drugs on that occasion?	10:10:43 2	148 Kevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCorpersonnel do.
65/01:05 3	Kevin Duffy any problems that occurred after he stopped using drugs on that occasion? A. Correct.	03:03:43 2 03:03:45 3 03:03:43 4	Kevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCorpersonnel do. Q. Only if they're the ones doing the
02/01/05 3 02/01/40 4 03/01/40 5	Kevin Duffy any problems that occurred after he stopped using drugs on that occasion? A. Correct. Q. And is that something that should	00:00:43 2 03:03:45 3 03:03:45 4 03:03:49 5	148 Kevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCorpersonnel do.
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020135 3 000140 4 000141 5 020143 6 000146 7	Kevin Duffy any problems that occurred after he stopped using drugs on that occasion? A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422?	00:00:40 2 00:00:40 3 00:00:40 4 00:00:40 5 00:00:51 6 00:00:51 7	Kevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes.
05:01:05 3 00:01:40 4 00:01:41 5 03:01:43 6 00:01:45 7 00:01:45 8	Kevin Duffy any problems that occurred after he stopped using drugs on that occasion? A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical	00:00:40 2 00:02:45 3 00:02:45 4 00:02:40 5 00:02:51 6 00:02:51 7 00:02:52 7	Kevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction
03/01/35 3 03/01/40 4 03/01/45 5 03/01/45 6 03/01/45 7 03/01/45 8 03/01/45 9 03/01/45 10 03/02/45 10	Kevin Duffy any problems that occurred after he stopped using drugs on that occasion? A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days?	00:00:40 2 03:03:45 4 03:03:45 4 03:03:45 6 03:03:55 6 03:03:57 7 03:03:57 9	Xevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCor
03/01/35 3 03/01/40 4 03/01/40 5 03/01/40 6 03/01/40 7 03/01/40 8 03/01/40 9 03/01/40 11 03/02/02 12	Kevin Duffy any problems that occurred after he stopped using drugs on that occasion? A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes.	00:00:40 2 03:03:44 4 00:03:40 5 00:03:51 6 00:03:51 7 00:03:51 8 00:00:57 9 00:04:00 10	Xevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCor personnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer
03-01-35 3 dustries 4 4 cardinal 5 03-01-45 6 cardinal 1 03-02-02 12 33-02-02 13	Kevin Duffy any problems that occurred after he stopped using drugs on that occasion? A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes. Q. Not at the Receiving Screening?	00:00:40 2 03:03:40 4 00:03:40 5 00:03:51 6 00:03:52 7 00:03:52 8 20:00:57 9 00:04:00 10 03:04:06 11	Kevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCor personnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer to that question because if they're not doing it,
03/01/35 3 04/01/40 4 04/01/40 5 05/01/45 6 03/01/45 8 03/01/45 9 03/01/45 11 03/02/02 12 37/02/02 13 03/03/04 14	Revin Duffy any problems that occurred after he stopped using drugs on that occasion? A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes. Q. Not at the Receiving Screening? A. No.	00:00:40 2 05:02:45 3 05:02:45 4 00:02:40 5 00:02:51 6 05:02:52 7 00:00:00 8 00:00:00 9 05:04:00 10 05:04:05 11 00:04:05 12	Xevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCor personnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer
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03-01-35 3 04-01-36 6 02-01-36 8 02-01-36 9 03-02-26 12 33-02-02 13 03-02-02 15 03-02-02 16 03-02-02 16 03-02-02 17 03-02-02 18	Revin Duffy any problems that occurred after he stopped using drugs on that occasion? A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes. Q. Not at the Receiving Screening? A. No. Q. Then, why is the policy at Page 421 to 422 referred to as "Receiving Screening"? A. The policy refers to Receiving Screening.	00:00:40 2 00:02:40 4 00:02:40 5 00:02:51 6 00:02:51 8 00:02:57 9 00:02:57 11 00:02:22 13 00:02:22 13 00:02:23 15 00:02:23 16 00:04:34 17 00:04:34 17	Kevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCorpersonnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCorpersonnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer to that question because if they're not doing it, then whether they abide by it or not, becomes irrelevant. I don't want to spar with you, but there's somebody else filling this form out, and this policy refers specifically to what a
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03-01-35 3 04-01-10 6 05-01-10 6 05-01-10 6 05-01-10 1	A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes. Q. Not at the Receiving Screening? A. No. Q. Then, why is the policy at Page 421 to 422 referred to as "Receiving Screening"? A. The policy refers to Receiving Screening Screenings conducted by AmeriCor personnel. In this case, the Receiving Screenings were conducted by the correctional officers. And we	00:00:40 2 03:03:40 4 00:03:40 5 00:03:51 6 00:03:52 7 00:03:52 8 20:00:52 10 03:04:22 11 03:04:22 12 00:04:23 14 00:04:23 15 00:04:23 16 00:04:23 16 00:04:24 18 00:04:25 19 00:04:24 18	Kevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCorpersonnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCorpersonnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer to that question because if they're not doing it, then whether they abide by it or not, becomes irrelevant. I don't want to spar with you, but there's somebody eise filling this form out, and this policy refers specifically to what a registered nurse conducting a Receiving Screening would be required to do as an employee of
05/01/35 3 04/01/40 4 05/01/40 5 05/01/45 6 07/01/45 8 05/01/45 10 07/02/02 12 07/02/02 13 05/02/03 16 05/02/25 18 05/02/25 18 05/02/25 19 05/02/25 20 05/02/25 21	A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes. Q. Not at the Receiving Screening? A. No. Q. Then, why is the policy at Page 421 to 422 referred to as "Receiving Screening"? A. The policy refers to Receiving Screening. Screenings conducted by AmeriCor personnel. In this case, the Receiving Screenings were conducted by the correctional officers. And we don't write the policies and procedures for what	00:00:40 2 00:00:40 4 00:00:40 5 00:00:40 6 00:00:40 8 00:00:40 10 00:00:40 11 00:00:40 11 00:00:40 14 00:00:40 15 00:00:40 17 00:00:40 18 00:00:40 19 00:00:40 19 00:00:40 21	Xevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCor personnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer to that question because if they're not doing it, then whether they abide by it or not, becomes irrelevant. I don't want to spar with you, but there's somebody eise filling this form out, and this policy refers specifically to what a registered nurse conducting a Receiving Screening would be required to do as an employee of AmeriCor.
03-01-35 3 0 04-01-40 4 05-01-40 6 05-01-40 9 03-01-50 10 03-02-02 12 03-02-03 16 03-02-37 19 03-02-37 19 03-02-37 19 03-02-37 20 03-02-37	A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes. Q. Not at the Receiving Screening? A. No. Q. Then, why is the policy at Page 421 to 422 referred to as "Receiving Screening"? A. The policy refers to Receiving Screening. Screenings conducted by AmeriCor personnel. In this case, the Receiving Screenings were conducted by the correctional officers. And we don't write the policies and procedures for what the correctional officers do or don't do.	00:00:40 2 00:02:40 4 00:02:40 5 00:02:51 6 00:02:51 6 00:02:51 7 00:00:02 8 00:00:02 10 00:00:02 11 00:00:02 12 00:00:02 15 00:00:02 15 00:00:02 16 00:00:03 17 00:00:03 18 00:00:03 19 00:00:03 19 00:00:03 20 00:00:03 21 00:00:03 21 00:00:03 21	Kevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCor personnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer to that question because if they're not doing it, then whether they abide by it or not, becomes irrelevant. I don't want to spar with you, but there's somebody eise filling this form out, and this policy refers specifically to what a registered nurse conducting a Receiving Screening would be required to do as an employee of AmeriCor. Q. In any event, we're in agreement
05-01-35 3 04-01-46 5 03-01-46 6 03-01-46 7 03-01-36 8 03-01-36 9 03-01-36 10 03-02-02 12 37-02-02 13 03-02-03 16 03-02-03 16 03-02-03 17 03-02-03 18 03-02-03 19 03-02-03 20 03-02-03 21 5 22 03-02-03 23	A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes. Q. Not at the Receiving Screening? A. No. Q. Then, why is the policy at Page 421 to 422 referred to as "Receiving Screening"? A. The policy refers to Receiving Screenings conducted by AmeriCor personnel. In this case, the Receiving Screenings were conducted by the correctional officers. And we don't write the policies and procedures for what the correctional officers do or don't do. Q. Did you ever speak to anypody from	50:00:40 2 50:00:40 5 60:00:50 6 60:00:50 6 60:00:50 7 60:00:50 7 60:00:50 10 60:00:50 11 60:00:20 13 60:00:20 14 60:00:20 15 60:00:20 16 60:00:20 16 60:00:20 16 60:00:20 17 60:00:20 16 60:00:20 17 60:00:20 19 60:00:20 19 60:00:20 19 60:00:20 19 60:00:20 19 60:00:20 20 60:00:20 21 60:00:40 22 60:00:40 23	Xevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCor personnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer to that question because if they're not doing it, then whether they abide by it or not, becomes irrelevant. I don't want to spar with you, but there's somebody else filling this form out, and this policy refers specifically to what a registered nurse conducting a Receiving Screening would be required to do as an employee of AmeriCor. Q. In any event, we're in agreement that the AmeriCor nurse is required to review the
0501.35 3 020740 4 030740 5 0301.43 6 020745 8 020745 9 0301.55 10 020202 12 200202 13 030202 14 030203 15 030203 16 030223 18 030223 18 030223 21 5 22 030224 21 5 22 030243 24 020243 24	A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes. Q. Not at the Receiving Screening? A. No. Q. Then, why is the policy at Page 421 to 422 referred to as "Receiving Screening"? A. The policy refers to Receiving Screenings conducted by AmeriCor personnel. In this case, the Receiving Screenings were conducted by the correctional officers. And we don't write the policies and procedures for what the correctional officers do or don't do. Q. Did you ever speak to anybody from Putnem County or from the facility with respect	00:00:40 2 00:00:40 4 00:00:40 5 00:00:40 6 00:00:40 8 00:00:40 10 00:00:40 11 00:00:40 14 00:00:40 14 00:00:40 15 00:00:40 17	A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCor personnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer to that question because if they're not doing it, then whether they abide by it or not, becomes irrelevant. I don't want to spar with you, but there's somebody eise filling this form out, and this policy refers specifically to what a registered nurse conducting a Receiving Screening would be required to do as an employee of AmeriCor. Q. In any event, we're in agreement that the AmeriCor nurse is required to review the correction officer's Receiving Screening?
05-01-35 3 04-01-46 5 03-01-46 6 03-01-46 7 03-01-36 8 03-01-36 9 03-01-36 10 03-02-02 12 37-02-02 13 03-02-03 16 03-02-03 16 03-02-03 17 03-02-03 18 03-02-03 19 03-02-03 20 03-02-03 21 5 22 03-02-03 23	A. Correct. Q. And is that something that should have been done, by reason of AmeriCor policy, Pages 421 to 422? A. That would have occurred as part of the physical assessment. Q. Meaning, the history and physical that's done within 14 days? A. Yes. Q. Not at the Receiving Screening? A. No. Q. Then, why is the policy at Page 421 to 422 referred to as "Receiving Screening"? A. The policy refers to Receiving Screenings conducted by AmeriCor personnel. In this case, the Receiving Screenings were conducted by the correctional officers. And we don't write the policies and procedures for what the correctional officers do or don't do. Q. Did you ever speak to anypody from	50:00:40 2 50:00:40 5 60:00:50 6 60:00:50 6 60:00:50 7 60:00:50 7 60:00:50 10 60:00:50 11 60:00:20 13 60:00:20 14 60:00:20 15 60:00:20 16 60:00:20 16 60:00:20 16 60:00:20 17 60:00:20 16 60:00:20 17 60:00:20 19 60:00:20 19 60:00:20 19 60:00:20 19 60:00:20 19 60:00:20 20 60:00:20 21 60:00:40 22 60:00:40 23	Xevin Duffy Q. Well, how would you phrase it? A. This policy directs what AmeriCor personnel do. Q. Only if they're the ones doing the Receiving Screening, you're saying? A. Yes. Q. So, in the case where a correction officer does a Receiving Screening, AmeriCor personnel do not have to abide by Pages 421 to 422? A. I'm not sure that there is an answer to that question because if they're not doing it, then whether they abide by it or not, becomes irrelevant. I don't want to spar with you, but there's somebody else filling this form out, and this policy refers specifically to what a registered nurse conducting a Receiving Screening would be required to do as an employee of AmeriCor. Q. In any event, we're in agreement that the AmeriCor nurse is required to review the

	Case 7:07-cv-02866-CS-GAY Documen	t- <u>23-22</u>	Filed 05/07/2008 Page 12 of 35
1	Kevin Duf	1	Kevin Duffv
03.04:58 2	Q. Within four hours; correct?	20:07:81 2	
G3:24:59 3	A. Yes.	cocrss 3	
no 4	Q. Are there any policies which	0307:51 4	Q. Is it required to be initiated at
.a 5		03.07 59 5	
659594 6		20.57.56 6	
036506 7	anything if certain aspects of that Receiving	03:28:00 7	
g0;05;17 8	Screening are not completed?	03:03:02 8	Q. And so, if an inmate comes in and
cs-06-1a 9	A. Not specifically,	02:04:05	
us ascia 10	Q. Is there any training that's	.01:08:10	
a::es:22 11	provided that you know of, where a nurse is	CDSE13 11	• • • •
co-2623 12	instructed what to do if, upon review of that		
ascest 13	Receiving Screening, they feel there were	030345 12	A. It would depend on whether the
020503 14	omissions?	02:01:19 13	
020235 1 -6 020236 15		m:225 14	Q. And in terms of symptoms, the next
	A. I guess it would depend on the omission.	50,000 15	the second secon
oussa: 16		03£83: 16	and pattern of use, the amount of opiate
00:05:42 17 40		02.05:38 17	consumed, and the period of time elapsed between
18 40	A. I mean, if the thing says — if the	33:05:29 18	the last use of the narcotic and the time of
020253 19	form comes to the nurse and it says, hospitalized	20:08:44 19	commitment to the facility. These factors should
20:25:25	ten years ago, I don't know that that requires	C3X845 20	be documented as part of the nursing assessment."
5058pt 21	any follow up.	03:08:52 21	What is the nursing assessment
032909 22	If it says the inmate is eight	03:05:5a 22	that's referred to in that procedure?
070400 23	months pregnant, then, yeah, I would expect	Фана 23	A. It would be the assessment done on
10:06:12 24	follow up.	300000 24	intake.
:3:06:12 25	Q. Well, was that ever communicated to	03ce 0x 25	Q. And so, when an inmate reports a
	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
	150		152
1	Kevin Duffy	1	Kevin Duffy
0.96:14 2	AmeriCor staff verbally or in writing, as far as	63:29:08 2	history of heroin or opiate use, the nurse is
3 (208.18	you know?	070413 3	required to assess those particular factors?
3,06-25 4	A. Specifically, I don't know.	œ:09:16 4	 A. If there is evidence to support it,
0:06:29 5	Q. Go back, if you would, to the 2003	an;an;g• 5	yes.
assa 6	policy I'm sorry Procedure Manual,	G3.59.24 G	Q. What would evidence to support it
5 9 5%3 7	Exhibit 28, Page 518.	03:08:27 7	consist of?
20259 8	A. (Witness complies)	03:09:27 8	A. If the inmate were showing symptoms.
3:07:0 9	Q. It's a three-page procedure with	20:08:00 9	Q. Only if they're showing symptoms at
0:07:5 4 10	respect to oplate detoxification.	03,59.02 10	the time of intake?
axxxx 11	Do you see that?	03.6954 11	A. Generally, yes.
207.07 12	A. Yes.	01:02:15 12	Q. What if they have needle marks in
1:07:07 13	Q. And that would include heroin;	D1:09:37 13	their arms?
14 natur	correct?	00:09:01 14	A. The nurse would probably lend more
10/:ng 15	A. Yes.	63x997 15	credence to the report of abuse then if there
807:20 16	Q. This procedure in the second I'm	01:02:52 16	were no track marks.
207-17 17	sorry. In the first paragraph says, "Inmates who	agas:ss 17	Q. Do you know if in Spencer's case, he
xa7;zc 18	report a history of opiate, including but not	03:39:51 18	had any track marks?
ಯ ಇ 19	Ilmited to heroin and Methadone use, when	ta.ca4s 19	
erze 20	committed to the facility are to be evaluated for	030999 19	• • • • • • • • • • • • • • • • • • • •
0750 21	the potential for the onset of symptoms of		No, I'm not.
. 22 . 22	narcotic withdrawai."	0>1::M 2.1	Q. Did you over see photographs of him?
		20:10-22 22	A. No.
	Do you see that?	69-10-cz 23	Q. Do you recall seeing any photographs
37:34 23			
.ar;sa 23 .ar 2a 24	A. Yes.	03:004 24	that were taken after he committed suicide?
37:34 23		03:004 24 03:1306 25	that were taken after he committed suicide? A. No. COMPU-TRAN SHORTHAND REPORTING

1		·· Cas e 7:07-cv-02866-CS-GAY Dqçymen	-23-22	Filed 05/07/2008 Page 13 of 35
ļ		, , , , , ,		- ·
ĺ	1	Kevin Dufi	1	
62:10:02	2	Q. It says here, "Symptoms, when they	axi≥0\$ 2	,
03.50.50	3	occur, may range from mild to severe and will	G3:12:12 3	
I 13	4	generally peak between 24 and 72 hours after the	03:12:13 4	, , , , , , , , , , , , ,
·	5 6	last use."	03:02:15 5	The state of the s
03.1078	7	A. Yes.	a2-17:2: 6	7.1. 133.
03:10:19	8	Q. Did you write this procedure?	63:12:56 7	The first terms of the symptoms of the
03:10:21	9	A. Yes.	03;1220 8	
03:10:21	_	Q. Where did you get that information? A. From the literature, from documents.	33/247 9	The second secon
03:1023 1		A. From the literature, from documents that I was familiar with, and from experience.	00.120 ≥ 10	the contract of the contract o
02:1046 1		Q. And these were all things that you	00;12;29 27	the state of the s
ap:10.50 1		knew of on or before March 3rd of 2004?	03:1242 12	
03:032 1		A. Yes.	05:2245 13	
22:12:53		Q. Have you, since that time, learned	m.12.51 15	
1 20:10:55 1		of anything that would cause you to write or	03:12:51 15	
00;10;56 1		change in any way this procedure in terms of	05:15:76 17	
03.21.61		symptoms appearing or peaking. I should say,	02:15:20 18	
03:11.04 1		between 24 and 72 hours after use?	ca.1250 19	•
01:11:06 2		A. No.	[ca:13:21 20	_
G0:11:06 2		Q. In terms of signs of mild	03:13:22 21	A. In writing.
05:11:4 2		withdrawal, was there any indication in any of.	03:13:25 22	Q. Anything verbal?
23011016 2	3	the records you saw about Spencer, including the	03:13:27 23	, ,
	4	ones I showed you today, as to whether or not he	03:13:51 24	MS. BERG: Can we have
cs:11:22 2 5		had a runny nose?	03:52:52 25	marked as Exhibit 31 a copy of a
		COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
		154		156
	1	154 Kevin Duffy	. 1	156 Kevin Duffy
	1		1 03:33:55 2	Kevin Duffy
Ga:11:24 2	_	Kevin Duffy	ì	
Ga:11:24 Ga:11:24	2	Kevin Duffy A. No.	03:13:5 2	Kevin Duffy letter dated October 23rd, 2006, ол
03:11:24 2 03:11:24 3 03:11:25 4	2	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No.	03:13:ES 2	Kevin Duffy letter dated October 23rd, 2006, ол АглегіСог, Inc. letterhead to
G3:11:24 2 G3:11:24 2 G3:11:25 4	2 3 4 5 6	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had	03:33:5 2 03:1601 3 03:14:04 4	Kevin Duffy letter dated October 23rd, 2006, ол AmeriCor, Inc. letterhead to Commissioner Lamy.
03:11:24	2 3 4 5 6 7	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite?	03:13:55 2 03:14:01 3 03:14:04 4 03:14:04 5	Kevin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whiereupon, three-page 10/23/06 letter
03:11:24	2 3 4 5 6 7 8	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No.	03:13:55 2 03:14:01 3 03:14:04 4 03:14:44 5 03:14:49 6	Kevin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the
03:11:24	2 3 4 5 6 7 8 9	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had	03:13:55 2 03:14:01 3 03:14:04 4 03:14:14 5 03:14:19 6 02:14:19 7 03:14:55 8 00:15:09 9	Kevin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whiereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after
03:11:24	2 3 4 5 6 7 8 9 0	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes?	03:13:55 2 03:14:01 3 03:14:04 4 03:14:44 5 03:14:49 6 02:14:59 7 03:14:59 8 03:15:09 9 03:15:09 9	Kevin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of
02:11:24	2 3 4 5 6 7 8 9 0 1	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No.	03:13:55 2 03:14:01 3 03:14:04 4 03:14:44 5 03:14:59 6 02:14:59 7 03:14.55 8 00:15:05 9 03:15:05 10 03:15:05 11	Kevin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov?
03:11:24	2 3 4 5 6 7 8 9 0 1 2	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he	03:13:55 2 03:14:01 3 03:14:04 4 03:14:04 5 03:14:09 6 03:14:09 7 03:14:52 8 03:16:09 9 03:15:06 11 03:15:01 12	Kevin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whiereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Slnkov? A. Yes.
03:11:24	2 3 4 5 6 7 8 9 0 7 2 3	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety?	03:13:55 2 03:14:01 3 03:14:04 4 03:14:49 6 02:14:59 7 03:14:51 8 03:15:09 9 03:15:09 10 03:15:01 11 03:15:11 12 03:15:12 13	Kevin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry.
02/1/26 4 02/1/27 4 02/1/27 4 02/1/27 6 02/1/27 6 02/1/27 6 02/1/27 6 02/1/27 1 1 02/1/27 1 1 02/1/27 1 1 2 02/1/2	2 3 4 5 6 7 8 9 0 1 2 3 4	Kevin Duffy A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier,	03:13:55 2 03:14:01 3 03:14:04 4 03:14:44 5 03:14:54 6 02:14:54 7 03:14:54 8 03:15:05 10 03:15:05 10 03:15:05 11 03:15:05 11 03:15:05 12 03:15:05 13 03:15:05 14	Kevin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead.
02:11:24	2 3 4 5 6 7 8 9 0 1 2 3 4 5	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms.	03:13:55 2 03:14:04 4 03:14:04 5 03:14:05 6 03:14:05 8 03:14:05 8 03:15:05 10 03:15:05 11 03:15:05 12 03:15:05 14 03:15:05 14	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whiereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry, Go ahead. A. Before we get any further, what was
03/1/26 4 05/1/26 4 05/1/26 4 05/1/26 5 05/1/26 5 05/1/26 12 05/1/	2 3 4 5 6 7 8 9 0 1 2 3 4 5 6	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms	03:13:55 2 03:14:01 3 03:14:04 4 03:14:09 6 02:14:09 7 03:14:54 8 00:15:09 9 03:15:09 11 03:15:01 12 03:15:01 12 03:15:01 13 03:15:01 14 03:15:05 15 03:13:17 16	Kevin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to
02/1/26 4 02/1/27 4 02/1/27 4 02/1/27 5 02/1/27 5 02/1/27 1 02/1/27 1 1 02/1/27 1 1 1 02/1/27 1 1 1 02/1/27 1 1 1 02/1/27 1 1 1 1 02/1/27 1 1 1 1 02/1/27 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 3 4 5 6 7 8 9 0 1 2 3 4 5 6 7	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms A. Right,	03:13:25 2 03:14:01 3 03:14:04 4 03:14:04 5 03:14:04 6 02:14:04 7 03:14:51 8 03:15:05 10 03:15:05 11 03:15:05 12 03:15:05 14 03:15:05 15 03:15:05 15 03:15:05 15	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to MS. BERG: We're going to
02:11:24	2 3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 3	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms A. Right, Q do you know if anybody ever	03:13:55 2 03:14:04 4 03:14:04 5 03:14:05 6 03:14:05 8 03:14:05 9 03:15:05 10 03:15:05 11 03:15:05 14 03:15:05 14 03:15:05 15 03:15:15 15 03:15:15 17 03:15:15 17	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to MS. BERG: We're going to take a break for lunch, but we're
02:11:24	2 3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 3 9	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms A. Right, Q do you know if anybody ever inquired as to whether or not he felt nauseous?	03:13:55 2 03:14:04 4 03:14:04 5 03:14:05 6 03:14:05 7 03:14:05 8 03:15:05 10 03:15:05 11 03:15:05 12 03:15:05 14 03:15:05 15 03:15:17 16 03:15:18 17 03:15:19 18 03:15:19 18	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to MS. BERG: We're going to take a break for lunch, but we're going to try to get you out of here
02/1/26 4 02/1/27 4 02/1/27 4 02/1/27 4 02/1/27 4 02/1/27 1 1 02/1	2 3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 3 9 0	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms A. Right, Q do you know if anybody ever inquired as to whether or not he felt nauseous? A. Not specifically.	03:13:25 2 03:14:01 3 03:14:01 4 03:14:04 5 03:14:04 6 02:14:02 7 03:14:51 8 03:15:03 9 03:15:03 10 03:15:03 11 03:15:03 12 03:15:03 14 03:15:03 15 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 18	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to MS. BERG: We're going to take a break for lunch, but we're going to try to get you out of here before we do that, so if you want
03/1/26 4 03/1/27 4 03/1/27 14 03/1/27 14 03/1/27 14 03/1/27 15 03/1/27 17 03/1/27 18 03/1/27 18 03/1/27 18 03/1/27 19 03/1/27 19 03/1/27 20 03	2 3 4 5 6 7 8 9 0 7 2 3 4 5 6 7 3 9 0 1	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms A. Right, Q do you know if anybody ever inquired as to whether or not he felt nauseous? A. Not specifically. Q. Do you know if anybody ever asked	03:13:25 2 03:14:01 3 03:14:04 4 03:14:04 5 03:14:04 6 03:14:04 7 03:14:04 9 03:14:04 9 03:15:05 10 03:15:05 11 03:15:05 12 03:15:05 14 03:15:05 15 03:15:15 15 03:15:15 17 03:15:15 18 03:15:15 18 03:15:15 18 03:15:15 19 03:15:22 20 03:15:22 20	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to MS. BERG: We're going to take a break for lunch, but we're going to try to get you out of here before we do that, so if you want to take a few minutes now
03/1/26 4 03/1/27 6 03/1/28 6 03/1/29 6 03/1/29 6 03/1/29 6 03/1/29 11 03/1/2	2 3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 8 9 0 1 2 3	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms A. Right, Q do you know if anybody ever inquired as to whether or not he felt nauseous? A. Not specifically. Q. Do you know if anybody ever asked him whether or not he had muscle cramps?	03:13:55 2 03:14:01 3 03:14:01 4 03:14:02 6 03:14:03 6 03:14:03 7 03:14:03 9 03:15:03 10 03:15:03 11 03:15:03 12 03:15:03 15 03:15:03 15 03:15:03 15 03:15:03 17 03:15:03 18 03:15:03 19 03:15:03 19 03:15:03 19 03:15:03 19	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whiereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Slnkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to MS. BERG: We're going to take a break for lunch, but we're going to try to get you out of here before we do that, so if you want to take a few minutes now THE WITNESS: How long is it
02/1/26	2 3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 8 9 0 1 2 3	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms. A. Right, Q. — do you know if anybody ever inquired as to whether or not he felt nauseous? A. Not specifically. Q. Do you know if anybody ever asked him whether or not he had muscle cramps? A. No.	03:13:25 2 03:14:01 3 03:14:01 4 03:14:01 5 03:14:01 6 02:14:01 7 03:14:51 8 03:15:02 9 03:15:02 10 03:15:02 11 03:15:03 14 03:15:03 14 03:15:03 15 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 18 03	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to MS. BERG: We're going to take a break for lunch, but we're going to try to get you out of here before we do that, so if you want to take a few minutes now THE WITNESS: How long is it going to take to finish up,
02/1/20	23456789012345673911234	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms. A. Right, Q. — do you know if anybody ever inquired as to whether or not he felt nauseous? A. Not specifically. Q. Do you know if anybody ever asked him whether or not be had muscle cramps? A. No. Q. The procedure at the bottom in terms	03:13:25 2 03:14:01 3 03:14:01 4 03:14:02 6 03:14:03 6 03:14:03 8 03:14:03 9 03:15:05 10 03:15:05 11 03:15:05 12 03:15:05 14 03:15:05 15 03:15:15 15 03:15:15 17 03:15:15 18 03:15:15 18 03:15:15 19 03:15:25 20 03:15:25 21 13:16:25 22 13:16:25 22 13:16:25 22 13:16:25 22 13:16:25 22 13:16:25 22 13:16:25 22 13:16:25 22	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to MS. BERG: We're going to take a break for lunch, but we're going to try to get you out of here before we do that, so if you want to take a few minutes now THE WITNESS: How long is it going to take to finish up, approximately?
03/1/26	23456789012345673911234	A. No. Q. Anything about whether or not he had watery eyes? A. No. Q. Anything about whether or not he had loss of appetite? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he had hot or cold flashes? A. No. Q. Anything about whether or not he felt anxious or exhibited anxiety? A. Based on what I reviewed earlier, I'd say he didn't have any of these symptoms. Q. In terms of the moderate symptoms. A. Right, Q. — do you know if anybody ever inquired as to whether or not he felt nauseous? A. Not specifically. Q. Do you know if anybody ever asked him whether or not he had muscle cramps? A. No.	03:13:25 2 03:14:01 3 03:14:01 4 03:14:01 5 03:14:01 6 02:14:01 7 03:14:51 8 03:15:02 9 03:15:02 10 03:15:02 11 03:15:03 14 03:15:03 14 03:15:03 15 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 17 03:15:03 18 03	Revin Duffy letter dated October 23rd, 2006, on AmeriCor, Inc. letterhead to Commissioner Lamy. (Whereupon, three-page 10/23/06 letter was marked as Plaintiff's Exhibit No. 31, for id.) Q. Did you send Exhibit 31 to the New York State Commission of Correction after reviewing its initial report on the death of Spencer Sinkov? A. Yes. Q. And that's your signature sorry. Go ahead. A. Before we get any further, what was the answer to MS. BERG: We're going to take a break for lunch, but we're going to try to get you out of here before we do that, so if you want to take a few minutes now THE WITNESS: How long is it going to take to finish up,

	Case 7:07-cv-02866-CS-GAY Documen	t- <u>23-22</u>	Filed 05/07/2008 Page 14 of 35		
1			1 Kevin Duffv		
03013:20 2	•		2 Q. Do you know if it was more or less		
 pa:isaz 3	THE WITNESS: That's fine. Okay.	05124	3 than five minutes?		
1 7,4	MS, BERG: You're sure?	92:17:45	A. I wouldn't hazard a guess on that.		
, a 5	TH≣ WITNESS: Yes.	dan february	Q. In letter C under Number 1, intake		
92:15:25 B	Q. On the lest page of Exhibit 31,	3 09.1750			
00:15:27 7	that's your signature?	03.17:54	_		
07-75/28 B	A. Yes.	03:17.57			
03,1029 9	Q. Did anybody assist you in drafting	03:18.01			
00:15/1Z 10	_	03.1602 10			
n:seq 11	A. No.	021822 11			
03:19:42 12	Q. In terms of the information	02:18.05 12			
pp:1895 13	pertaining to the intake screening, what, if any,	CO:18:27 13	· · · · · · · · · · · · · · · · · · ·		
22:15:59 14	information were you provided with, other than	ganess 14	The second secon		
335551 15	the medical record on which you based those	i	,,, ***************		
03.18.54 16	statements?	0x1a:23 15			
03:15:54 1 7		20:18:28 16			
		49:26:45 17			
18 (0:19:19	and I had the medical record.	03:1241 18	The second secon		
19	Q. Did you, for example, get	03:18:54 19	and a serious of the		
cs::::::::::::::::::::::::::::::::::::	information from Nurse Paul Clarke Peter	Outrasée 20	communicated to him, that would warrant follow up.		
03-18:08 21	Clarke, excuse me about what you put in your	ca::859 21	Well, correct me if I'm wrong, but		
03;18:00 22	letter to the Commission?	03:13:02 22	I'm reading here that you wrote that his score on		
ca;18:25 23	A. Based on what's in here, I'm sure I	D3:19:04 23	the Suicide Prevention Screening Guidelines did		
ca::a27 24	spoke to Peter.	60:1959 24	warrant follow up.		
cs.16:38 25	Q. Do you recall doing so as you sit	co:19:01 25	 Well, as I indicated earlier, what 		
	COMPU-TRAN SHORTHAND REPORTING	1	COMPU-TRAN SHORTHAND REPORTING		
	158	İ	180		
1	Kevin Duffy	1	Kevin Duffy		
0207923G 2	here today?	03:19:14 2	is on the report does not necessarily coincide		
03,18;20 3	A. Yeah. It seems to me I talked to	09:39:18 3	with what the nurse gets out of his or her		
03:16:24 4	him on the phone.	02:15:20 4	assessment.		
09:19:04 5	Q. Do you recall anything that he said	pp:1824 5	Q. So, in terms of Susan Waters'		
03:35:36 6	to you or that you said to him?				
02:16:40 7	A. I don't remember the all of the	40:19 \$s 5	referral to mental health, why would that he done		
	A. I don't remember the all of the	03:19 \$6 6 03:19 \$22 7			
on:16x18 8	details of the conversation. What stuck in my		if there was no indication to anyone that Spencer		
-		d3.19852 7			
60:15:2Z B	details of the conversation. What stuck in my	03.1932 7 03.1936 8	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto refiex.		
ta:16:57 10	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov,	03.19.52 7 03.19.36 8 03.19.37 9	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean?		
tonesz 9 03:1657 10 03:200 11	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't he wasn't aware that he was an	03.7932 7 03:19:36 8 03:19:37 9 03:19:37 10	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just		
03:16:57 10 03:16:57 11 01:07:00 11 03:17:00 12	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was	03.7932 7 03:19:35 8 03:19:37 9 03:19:37 10 02:12:40 11	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the		
toness 9 03:1657 10 03:1657 11 03:17:00 12 03:17:00 13	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did	03.79.52 7 03.19.35 8 03.19.37 9 03.19.39 10 03.13.40 11 03.10.42 12	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing.		
03:16:57 10 03:16:57 10 03:17:00 11 03:17:00 12 03:17:00 13	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait	03.19.22 7 03.19.35 8 03.19.37 9 03.19.39 10 03.19.40 11 03.19.42 12 03.19.46 13 03.19.45 14	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would		
00:16:92 9 00:16:57 10 00:27:00 11 00:27:00 12 00:17:00 13 00:17:00 14 00:17:00 15	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate.	03.19.52 7 03.19.55 8 03.19.07 9 03.19.09 10 03.19.40 11 03.19.42 12 03.19.45 13 03.19.55 14 03.19.55 15	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov		
00:05:22 8 03:05:27 10 03:07:00 11 03:07:00 12 03:07:00 13 03:07:00 15 03:07:01 15	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't — he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do?	03.09.22 7 03.19.15 8 03.19.07 9 03.19.09 10 03.19.00 11 03.19.00 13 03.19.00 14 03.19.00 15 03.19.00 15	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift?		
00:16:52 8 03:16:57 10 01:27:00 12 02:17:00 12 02:17:00 13 02:17:00 14 02:17:00 15 02:17:17 16 02:17:18 17	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't — he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do? A. He sat down in a specific chair that	03.19.22 7 03.19.25 8 03.19.27 9 03.19.20 10 02.19.40 11 03.19.42 12 03.19.40 13 03.19.45 14 02.19.55 15 03.19.23 16 03.19.23 17	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift? A. She was probably following up on who		
0001842 9 0031657 10 0021700 11 0021700 12 0021700 13 0021700 15 0021701 15 0021701 17 0021701 18	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do? A. He sat down in a specific chair that nobody but an inmate would sit in.	03.19.52 7 03.19.55 8 03.19.07 9 03.19.09 10 03.19.40 11 03.19.42 12 03.19.45 14 03.19.55 15 03.19.55 16 03.19.55 17 00.19.55 18	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift? A. Site was probably following up on who came in on the shift before her.		
0011642 9 0031657 10 0021700 11 0021700 12 0031700 13 0031700 13 0031700 15 0032717 16 0031700 17 0031700 18 0031700 18	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't — he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do? A. He sat down in a specific chair that nobody but an inmate would sit in. Q. Did Peter Clarke ever indicate to you	03.09.22 7 03.19.25 8 03.19.27 9 03.19.20 10 03.19.20 12 03.19.20 13 03.19.25 14 03.19.25 15 03.19.25 15 03.19.25 17 03.19.25 18 03.19.25 19	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift? A. Size was probably following up on who came in on the shift before her. Q. Do you know, one way or the other,		
0011692 9 0011657 10 0021700 11 0021700 12 0021700 13 0021700 15 0021701 15 0021701 17 0021701 18 0021702 19 0021702 19	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't — he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do? A. He sat down in a specific chair that nobody but an inmate would sit in. Q. Did Peter Clarke ever indicate to you how long, in total, he observed Spencer on May 20th?	03.19822 7 03.19135 8 03.19037 9 03.19039 10 02.1840 11 03.1942 12 03.1948 13 03.1955 14 03.1955 15 03.1955 17 00.1955 18 03.1955 19 03.22007 20	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift? A. Size was probably following up on who came in on the shift before her. Q. Do you know, one way or the other, whether or not she was doing that?		
tonsez 9 131657 10 142760 12 143760 13 144 1576176 15 1576176 17 1576176 18 1576176 18 1576176 18 1576176 18 1576176 18 1576176 18 1576176 18 1576176 18 1576176 18 1576176 18 1576176 18 1576176 18	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't — he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do? A. He sat down in a specific chair that nobody but an inmate would sit in. Q. Did Peter Clarke ever indicate to you how long, in total, he observed Spencer on May 20th? A. Not that I recall.	03.19.52 7 03.19.55 8 03.19.57 9 03.19.50 10 03.19.40 12 03.19.42 12 03.19.45 14 03.19.55 15 03.19.55 15 03.19.55 17 00.19.55 18 03.19.55 19 03.22.57 20 03.20.52 21	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift? A. Site was probably following up on who came in on the shift before her. Q. Do you know, one way or the other, whether or not she was doing that? A. No.		
0011642 9 0031657 10 0021700 11 0021700 12 0021700 13 0031700 15 0031700 15 0031700 17 0021720 18 0031720 19 0031720 20 0031720 21 4 22	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't — he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do? A. He sat down in a specific chair that nobody but an inmate would sit in. Q. Did Peter Clarke ever indicate to you how long, in total, he observed Spencer on May 20th? A. Not that I recall. Q. Or how long in total he spent	03.49.52 7 03.49.55 8 03.49.57 9 03.49.50 10 03.49.52 12 03.49.55 14 03.49.55 15 03.49.55 17 03.49.55 18 03.49.55 19 03.20.07 20 03.20.07 21 03.20.07 22	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift? A. Site was probably following up on who came in on the shift before her. Q. Do you know, one way or the other, whether or not she was doing that? A. No. Q. You write in the last sentence,		
0001642 9 0001657 10 0001657 10 0001700 12 0001700 13 0001700 15 00001700 15 00001700 15 00001700 15 00001700 15 00001700 15 00001700 15 00001700 15 00000	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't — he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do? A. He sat down in a specific chair that nobody but an inmate would sit in. Q. Did Peter Clarke ever indicate to you how long, in total, he observed Spencer on May 20th? A. Not that I recall. Q. Or how long in total he spent communicating with him?	03.39.22 7 03.19.15 8 03.19.07 9 03.19.07 10 03.19.04 12 03.19.05 14 03.19.05 15 03.19.05 16 03.19.05 17 00.19.05 18 03.19.05 19 03.22.07 20 07.20.05 21 00.20.05 22 07.20.05 23	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift? A. Sike was probably following up on who came in on the shift before her. Q. Do you know, one way or the other, whether or not she was doing that? A. No. Q. You write in the last sentence, *Later that same morning, the day shift R.N. also		
0001892 9 0001897 10 0001897 10 0001700 12 0001700 13 0001700 15 0001700 15 0001700 18 0001700 18 0001700 18 0001700 20 0001700 21 4 22 0001700 23 0001700 23 0001700 23	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't — he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do? A. He sat down in a specific chair that nobody but an inmate would sit in. Q. Did Peter Clarke ever indicate to you how long, in total, he observed Spencer on May 20th? A. Not that I recall. Q. Or how long in total he spent communicating with him? A. No. He talked with him; I don't	03.19.22 7 03.19.35 8 03.19.37 9 03.19.30 10 03.19.40 11 03.19.42 12 03.19.45 14 03.19.55 15 03.19.35 17 00.19.35 17 00.19.35 19 03.22.37 20 01.23.52 21 00.20.02 22 00.20.04 23 00.20.10 24	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift? A. Site was probably following up on who came in on the shift before her. Q. Do you know, one way or the other, whether or not she was doing that? A. No. Q. You write in the last sentence, *Later that same morning, the day shift R.N. also completed a referral form."		
0001642 9 0001657 10 0001657 10 0001700 12 0001700 13 0001700 15 00001700 15 00001700 15 00001700 15 00001700 15 00001700 15 00001700 15 00001700 15 00000	details of the conversation. What stuck in my mind was that when he initially saw Mr. Sinkov, he didn't — he wasn't aware that he was an inmate. Okay? As I recall, Peter said he was laughing and taiking and, you know, so forth and so on. And it wasn't until Mr. Sinkov did something specific that Mr. Clarke realized, wait a minute; this guy is an inmate. Q. What did he do? What did Spencer do? A. He sat down in a specific chair that nobody but an inmate would sit in. Q. Did Peter Clarke ever indicate to you how long, in total, he observed Spencer on May 20th? A. Not that I recall. Q. Or how long in total he spent communicating with him?	03.39.22 7 03.19.15 8 03.19.07 9 03.19.07 10 03.19.04 12 03.19.05 14 03.19.05 15 03.19.05 16 03.19.05 17 00.19.05 18 03.19.05 19 03.22.07 20 07.20.05 21 00.20.05 22 07.20.05 23	if there was no indication to anyone that Spencer had any problems that he was presenting? A. Auto reflex. Q. What does that mean? A. It means that sometimes you just make the referral and let somebody else make the assessment/determination for a specific thing. Q. Do you know why Susan Waters would have been reviewing, specifically, Spencer Sinkov on her shift? A. Sike was probably following up on who came in on the shift before her. Q. Do you know, one way or the other, whether or not she was doing that? A. No. Q. You write in the last sentence, *Later that same morning, the day shift R.N. also		

			Case 7:07-cv-02866-CS-GAY Dogumen	t 23-2 2	2	Filed 05	5/07/2008 Page 15 of 35 163	
ļ		1	1 Kevin Duff		1		Kevin Duffy	
۵.	0:20.1	ı3 2	Q. And that's Susan Waters; correct?	93:22:44	2	Q.	It was just confirmed in writing	
0.5	3 25.1	÷ 3	A. Yes.	G3:22:46	_	same mon		
1,	77:1	6 4	Q. Do you recall what you based your	n3-27:47	4	A,	Yes.	
		s 5		40:22:47	5	Q.	Other than that letter that's before	
j as	1.2%2	, 6	the morning of May 20th, 2006?	60:22:61	6	you as Exh	nibit 31, did you have any other	
į a	1:20:2	, 7	A. Not specifically.	93-22:54	7		acions with the Commission?	
03	20.2	, 8	Q. On the second page, letter E, the	03:22:57	8	Α,	No.	
93	.25(4)	2 9		C02258	9	Q.	Did the county, to your knowledge,	
ea	:20:47	10	recommending vital signs.	032300	10		y investigation with respect to	
C9	205	: 11	Do you see that?	20:21:00	11	Spencer's o		
03	29:54	12	A. Yes.	00:20:00 '	12	Α.	Yes.	
933	20:54	13	 Q. Do you recall having a conversation 	032306	13	Q.	To your knowledge, what did that	
ea:	2::24	14		03:24:05	14	involve?		ĺ
ca:	21:24	15	A. Yes.	50k-20;11 °	15	Α.	I don't know. I wasn't involved in it.	
051	21:04	16	Q. What did he say to you, and what did	C929-39	16	Q.	Did anybody question you?	ļ
23:	21:06	17	you say to him?	02.23.15	17	A.	No.	ļ
an:	71 - 08	18	 We were at a meeting, and he noted 	0.023:17 1	18	Ō.	Did you provide a statement to	
03.5	21 : 4	19	that the Commission thought that vital signs	20:20:58 1	19	anyone?	. ,	
03.5	21.13	20	should be performed or obtained; and as a matter	032319 2	20	Α,	No, not that I recall.	
02:3	25:32	21	of facility policy, even if it wasn't required,	00 20 22 Z	21	Q.	Do you know if any of your amployees	J
032	21:37	22	he thought it was a good idea that we do it.	10:20:as 2	22	were questi	•	
02.2	21:29	23	And I said, okay.	092928 2	23		MR. COON: By the county?	
93:2	21:40	24	Do you recail who was in attendance	032327 2	24		MS, BERG: Yes.	1
00:2	21:42	25	at that meeting?	ax23:32 2	25	A.	I'm sure they must have been, but I	Í
. [COMPU-TRAN SHORTHAND REPORTING				OMPU-TRAN SHORTHAND REPORTING	-
				2				-
!			162	İ			164	-
ļ		1	Kevin Duffy	ĺ	1		164 Kevin Duffy	-
 cass .		1 2	Kevin Duffy A. Not specifically, but it probably		-	don't reme		-
03.2	1.48	1 2 3	Kevin Duffy A. Not specifically, but it probably would have been me, the sheriff, the captain and	g0:23:15	2	circumstan	Kevin Duffy ember where and under what aces.	-
03:2 03:2	1.48 1:51	1 2 3 4	Kevin Duffy A. Not specifically, but it probably would have been me, the sheriff, the captain and Mr. DiMattio.	go:20:15	2 (circumstan Q.	Kevin Duffy mber where and under what ces. Do you know if any of them provided	
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03-22 03	1.48 11.51 11.52 11.53 1	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Not specifically, but it probably would have been me, the sheriff, the captain and Mr. DiMattio. Q. You're guessing? A. Yes. Q. Anything else that the sheriff ever communicated to you in writing or verbally about vital signs being taken? A. He asked at a subsequent meeting if the change had been made, and I assured him that it had. Q. And the change was the one noted in DiMattio's November 27th, 2006, memo to the nursing staff? A. If that was the one that said take vital signs on everybody, yes. Q. This is Exhibit 24. (Handing) A. Thank you. (Witness peruses record) Yes. Q. So, at the time that you wrote to the Commission, October 23, 2006, that pokey had already been implemented?	03:23:35 03:23:25 03:23:24 03:23:44 03:23:44 03:23:44 03:23:45 03:23:55 11 03:23:55 12 03:24:22 13 03:24:25 14 03:24:25 15 03:24:25 16 03:24:25 17 03:24:26 18 03:24:26 18 03:24:41 19 03:24:41 20 03:24:41 21 03:24:41 22 03:24:41 23 03:24:41 23 03:24:41 24 03:24:41 25 03:24:41 26 03:24:41 27 03:24:41 28 03:24:41 29 03:24:41 20 03:24:41 20 03:24:41 20 03:24:41 20 03:24:41 20 03:24:41 21 03:24:41 22 03:24:41 23	2 3 4 5 6 7 8 9 0 1 2 3 4 to 12 3 4	circumstan Q. statements, A. them, Q. manual, Exh A. Q. Policy: Suice caragraph re or potential process, usin where applica screening Gu cool." Do A. Q. result of the n suicide pro- or the psychia	Kevin Duffy Imber where and under what Ices. Do you know if any of them provided Isworn statements? If they did, I would not have seen Take a look again at the 2004 Ibit 30. (Witness complies) The pages Bates stamped 448 to 450, Idea prevention." The first Infers to, "Inmates will be evaluated If itsk of suicide during the Intake Ing the Receiving Screening form and Iable, the Suicide Prevention Idealines form or a similar evaluation In you see that? Yes. Inmates determined to be at risk as Is screening process will be placed Interest to be a similar evaluation of the screening process will be placed Interest to be a similar evaluation of the screening process will be placed Interest to be a similar evaluation of the screening process will be placed	7.71

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į	1 Kevin Duti		167
	. Norm Dany	f	1 Kevin Duffy
	2 A. Yes. 3 Q. And in terms of those who are	1	 Q. That's not what it says, though;
03:20:54	The first and the same and	ļ ——	3 correct?
	to ad at 13th as a feath of chis	\$ 90:27:10 ·	4 MR. COON: Objection. The
1	The state of the s		5 document speaks for itself. It's
	the manufacture of the delating case, the	1	6 argumentative.
03.25.04	 7 Suicide Prevention Screening Guidelines form? 8 A. Yes. 		7 Q. Does the document say "as soon as
i			8 possible"?
03.25:12 1		97:51:55	
03.25:12 T		(0.272) 10	The same pocular in ady of Mexican Bill
692515 12		63.2723 11	-
032515 27		03.27.24 12	
012525 14		0.2725 13	
632332 15		03:27:27 14	Service and Perferring Mill onco.
032534 16		03/27/29 15	
2023.28 17 2023.28 17	- This o look of the Mext page, 1413.	00:27:30 16	Do you not thet
G225 47 18		052705 17	
05.2546 19		03:27:25 16	The state of the personal Arms (Co.
03:25:0 20		03:27:29 19	,,, seeman, training of finding;
022529 21	and the state of t	uszyau 20	welles o they were!
G32557 22	- Personnian	03.2741 21	The state of the s
032830 23		53:27:42 22	, that the man and t
0328.00 24	The state of the s	03.27;48 23	
002503 25	,	03:27:49 24	- William Co. 2000: The years theer.
1 4823%3 20	COMPU-TRAN SHORTHAND REPORTING	00:27:94 25	
!	166		COMPU-TRAN SHORTHAND REPORTING 168
1	Kevin Duffy	1 1	Kevin Duffy
0.73903 2	 Q. So, in terms of AmeriCor's policies, 	casa;11 2	(Question read)
03.28:07 3	the suicide precautions were 15-minute watches?	03.28.52 3	A. No.
03:26.13 4	A. Yes,	50:28:13 4	Q. You believe there was training
0325:14 5	 Q. And were pursing staff required to 	0328:15 5	before that time?
93:26:17 6	actually see the inmates on suicide precautions	03/20:15 6	A, Yes.
 сжж21 7	every 15 minutes?	cognie 7	Q. Are you aware of any records that
03:25:27 8	A. No.	03.28:19 8	would indicate that such training was given?
33.29.22 9	Q. Well, who would do that, then?	D3.28.25 9	A. There may be. I don't recall any
C3:26:25 10	A. The officer.	03:28:27 10	specific ones.
002027 11	Q. Back to Page 1, the portion of the	032820 11	MS. BERG: I'm going to call
0329-20 12	sentence I just read in the first paragraph:	03.2937 12	for the production of any records
03.9834 13	"Inmates determined to be at risk as a result of	0029:20 13	that would indicate suicide-
02:25:27 14	this screening process will be immediately	0328:25 14	prevention training being given to
03:2439 15	referred to the psychiatrist."	03:25.37 15	AmeriCor employees, other than the
33.25ct 16	Do you see that?	22:28:38 16	November, '06, records.
03.26stz 17	A. Yes,	032840 17	MR. COON: I'll take it
03:2642 18	Q. That means during the intake	03,29,40 18	under advisement.
		20:28:40 19	DOCUMENT/DATA REQUESTED:
032944 19	process; correct?		
03:06:58 20	A. Not necessarily.	0029:07 20	Q. Did the Putnam County Correctional
03:26:58 20 03:26:57 21	A. Not necessarily.Q. You don't believe that that's what	072907 20 072917 21	Q. Did the Putnam County Correctional Facility have a mental-health unit, as far as you
9302658 20 9312627 21 9 22	A. Not necessarily. Q. You don't believe that that's what your policy provides for?		I
\$22 \$23 \$23 \$23	A. Not necessarily. Q. You don't believe that that's what your policy provides for? A. I believe "immediately" here is	03/29/10 21	Facility have a mental-health unit, as far as you
9302658 20 9012827 21 9 22 3022700 23 9312700 24	A. Not necessarily. Q. You don't believe that that's what your policy provides for? A. I believe "immediately" here is intended to mean that the referral should be made	03/29/10 21 03/29/13 22	Facility have a mental-health unit, as far as you know? A. No. Q. Was AmeriCor providing services to
00:26:58 20 00:26:67 21 6 22 20:27:00 23	A. Not necessarily. Q. You don't believe that that's what your policy provides for? A. I believe "immediately" here is	03/29/10 21 03/29/13 22 03/29/13 23	Facility have a mental-health unit, as far as you know? A. No.

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	: : : : : : : : : : : : : : : : : : : :	40-22	Filed 05/07/2008 Page 17 of 35 171
1	Kevin Dui	į 1	•
01:29:25 2		2	! STATE OF NEW YORK)
00:29:27 : 3	A. We were providing medical and dental	3	55:
∮ ~∞ 4	services.	4	COUNTY OF WESTCHESTER)
5	Q. Was the nursing staff involved in	5	
03:29:22 6	the screening, the intake process, at that time?	6	
03.2927 7	 Not to an extent any different than 	7	
03:29:40 8	the time frame we're talking about.	8	I, KEVIN DUFFY, the witness herein,
G1:28:41 9	Q. Did you partake in any investigation	9	having read the foregoing testimony of the pages
c3:29:46 10	with respect to Rivera's death?	10	of this deposition, do hereby certify it to be a
0929:51 11	A. Not that I recall.	11	true and correct transcript, subject to the
03:29:52 12	 Q. Do you recall attending any meetings 	12	corrections, if any, shown on the attached page.
03:25:55 13	with county personnel, state commissioners, or	13	
00:29:58 14	anyone else pertaining to Rivera's death?	14	
00:20:00 15	A. Not that I recall.	15	000
03;2064 16	Q. Did you communicate with anyone	16	
93.33.08 17	within AmeriCor - a health-services administrator	17	•
e2:33:12 18	or anyone else - about Rivera's death?	18	•
03:30:15 19	 A. I'm sure as a matter of you know, 	19	
05:20:57 20	an inmate death is followed by a review - Did we	20	KEVIN DUFFY
03:00:24 21	have any information that might be needed by	21	
90000029 22	somebody? But since we were	22	Subscribed and sworn to before me
60:30:32 23	Q. Do you recall doing that, though?	23	this day of, 2008.
03:20:35 24	A. No. But you know, I mean, it's	24	
03,0000 25	just there's a general review that's done	25	
•	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
	170		172
1	170 Kevin Duffy	i	
1 03:30:30 2		i 2	
	Kevin Duffy		172 STATE OF NEW YORK)) ss
03:30:30 2	Kevin Duffy after an inmate dies.	2 3 4	STATE OF NEW YORK)
03:30:30 2 03:30:40 3	Kevin Duffy after an inmate dies. Q. I understand that that's what you're	2 3 4 5	172 STATE OF NEW YORK)) ss
03:20:30 2 03:20:30 3 03:20:42 4	Kevin Duffy after an inmate dies. Q. I understand that that's what you're saying happens; but do you recall doing so in	2 3 4 5 6	STATE OF NEW YORK)) ss COUNTY OF ROCKLAND)
03:30:30 2 03:30:30 3 03:30:32 4 03:30:45 5	Kevin Duffy after an inmate dies. Q. I understand that that's what you're saying happens; but do you recall doing so in connection with Rivera's death?	2 3 4 5	172 STATE OF NEW YORK)) ss COUNTY OF ROCKLAND) I, Donna Bochnik, Notary Public within
03:20:30 2 03:20:30 3 03:30:42 4 03:32:45 5 00:30:47 6	Kevin Duffy after an inmate dies. Q. I understand that that's what you're saying happens; but do you recall doing so in connection with Rivera's death? A. No.	2 3 4 5 6 7	STATE OF NEW YORK)) ss COUNTY OF ROCKLAND)
03:30:30 2 03:30:30 3 03:30:32 4 03:32:45 5 00:30:47 6 03:30:48 7	Kevin Duffy after an inmate dies. Q. I understand that that's what you're saying happens; but do you recall doing so in connection with Rivera's death? A. No. Q. Did you communicate with the	2 3 4 5 6 7 8 9	STATE OF NEW YORK)) ss COUNTY OF ROCKLAND) I, Donna Bochnik, Notary Public within and for the State of New York, do hereby
03:30:30 2 03:30:30 3 03:30:42 4 93:30:45 5 00:30:44 6 03:30:44 7 03:30:50 8	Kevin Duffy after an inmate dies. Q. I understand that that's what you're saying happens; but do you recall doing so in connection with Rivera's death? A. No. Q. Did you communicate with the Commission in any way, State Commission?	2 3 4 5 6 7 8 9 10 11	STATE OF NEW YORK)) ss COUNTY OF ROCKLAND) I, Danna Bochnik, Notary Public within and for the State of New York, do hereby certify: That I reported the proceedings in the
03:30:30 2 03:30:30 3 03:30:42 4 03:32:45 5 03:30:47 6 03:30:47 7 03:30:48 7 03:30:48 3	Kevin Duffy after an inmate dies. Q. I understand that that's what you're saying happens; but do you recall doing so in connection with Rivera's death? A. No. Q. Did you communicate with the Commission in any way, State Commission? A. On Rivera?	2 3 4 5 6 7 8 9 10 11 12	STATE OF NEW YORK)) ss COUNTY OF ROCKLAND) I, Donna Bochnik, Notary Public within and for the State of New York, do hereby certify: That I reported the proceedings in the within entitled matter, and that the within
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03:30:30 2 03:30:30 3 03:30:32 4 03:30:45 5 00:30:46 7 03:30:50 8 03:30:46 39 03:30:45 10 03:31:05 12 03:31:05 13 03:37:13 14 03:37:14 15 03:37:14 16	**Revin Duffy** after an inmate dies. Q. I understand that that's what you're saying happens; but do you recall doing so in connection with Rivera's death? A. No. Q. Did you communicate with the Commission in any way, State Commission? A. On Rivera? Q. Yes. A. Not that I recall. MS. SERG: Just give us five minutes. (Recess taken) MS. BERG: I have no further questions.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	STATE OF NEW YORK)) ss COUNTY OF ROCKLAND) I, Donna Bochnik, Notary Public within and for the State of New York, do hereby certify: That I reported the proceedings in the within entitled matter, and that the within transcript is a true record of said proceedings. I further certify that I am not related to any of the parties to the action by blood or marriage, and that I am in no way
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03:30:30 2 03:30:30 3 03:30:30 4 03:30:40 5 00:30:40 6 03:30:40 8 03:30:40 8 03:30:40 10 03:30:40 11 03:31:05 12 03:31:05 13 00:37:13 14 03:37:21 15 03:37:21 17 03:37:22 18 03:37:26 20 03:37:26 20	**Revin Duffy** after an inmate dies. Q. I understand that that's what you're saying happens; but do you recall doing so in connection with Rivera's death? A. No. Q. Did you communicate with the Commission in any way, State Commission? A. On Rivera? Q. Yes. A. Not that I recall. MS. SERG: Just give us five minutes. (Recess taken) MS. BERG: I have no further questions. MR. COON: Okay. MS. BERG: Do you, Tim? Questions? MR. COON: No. MS. BERG: All right.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	STATE OF NEW YORK)) ss COUNTY OF ROCKLAND) I, Danna Bochnik, Notary Public within and for the State of New York, do hereby certify: That I reported the proceedings in the within entitled matter, and that the within transcript is a true record of said proceedings. I further certify that I am not related to any of the parties to the action by blood or marriage, and that I am in no way interested in the outcome of this matter. IN WITNESS WHEREOF, I have hereunto set my hand this 24th day of January, 2008.
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